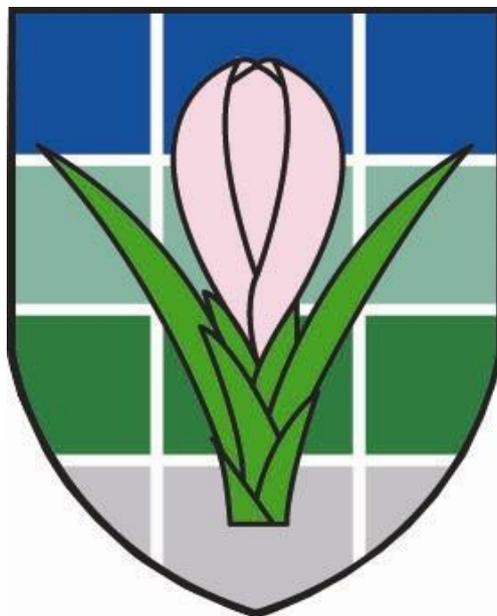


Saffron Walden County High School



Safeguarding and Child Protection Policy and Procedures

Date adopted or ratified: November 2016

This policy is regularly reviewed following recommended guidelines:

Reviewed May 2017 reviewed and readopted by LGB September 11th 2017

Reviewed August 2018 and readopted by the LGB September 11th 2018

Reviewed August 2019 and readopted by the LGB September 11th 2019

Reviewed August 2020 and readopted by the LGB September 11th 2020

Reviewed January 2021 in line with DfE KCSiE updates regarding Safeguarding during the lockdown period. LGB adoption extant.

Reviewed September 2021 and readopted by the LGB 27th September 2021

Updated September 2021

Keeping Children Safe in Education

September 2021

In September 2021 the DfE updated the statutory guidance on safeguarding.

Safeguarding and Child Protection Policy

School details

Governors' Committee Responsible: Standards and Education

Governor Lead: Barbara Calland

Nominated Lead Member of SLT: Matt Blayney

Designated Safeguarding Lead (DSL) and PREVENT Lead: Matt Blayney

Deputy DSL, Domestic Abuse Lead and Child Exploitation (CE) Lead: Sharon McCormick

Looked After Children, Child in Care and Previously Looked After Children Lead: Katie Pieri

Online Safety Lead: Paul Singh

Status & Review Cycle: Statutory Annual

Next Review Date: August 2022

Key Principles of the SWCHS Safeguarding and Child Protection Policy:

- Safeguarding is the 'Golden Thread' than runs through all of our work with children and young people.
- Safeguarding and Child Protection concerns do happen and have happened here on a daily basis. Be vigilant!
- All systems and processes should operate with the best interests of the child at heart.

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1.0 Introduction

1.1 This policy has been developed in accordance with the principles established by the following:

Section 175 of the Education Act 2002 (Section 157 for Independent schools) places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.

The development of appropriate procedures and the monitoring of good practice in Essex are the responsibilities of the Essex Safeguarding Children Board (ESCB). In Essex, all professionals must work in accordance with the SET Procedures (ESCB, 2019)

A copy of these procedures can be found on their website: <http://www.escb.co.uk>

Our school works in accordance with the following legislation and guidance:

Education and Training (Welfare of Children) Act 2021
Children Act 1989
Children Act 2004
Keeping Children Safe in Education (DfE, 2021)
Working Together to Safeguard Children (DfE, 2018)
Effective Support for Children and Families in Essex (ESCB)
Counter-Terrorism and Security Act (HMG, 2015)
Serious Crime Act 2015 (Home Office, 2015)
Sexual Offences Act (2003)
Education (Pupil Registration) Regulations 2006
Information sharing advice for safeguarding practitioners (HMG, 2015)
Data Protection Act 1998
What to do if you're worried a child is being abused (HMG, 2015)
Searching, screen and confiscation (DfE, 2014)
Mental Health and Behaviour in Schools (DfE 2014)
When to call the police (NSPCC)
Criminal Exploitation of children and vulnerable adults (Home Office 2017)

1.2 The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

1.3 We recognise that all adults, including temporary staff¹, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

¹ Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc, and governors

- 1.4 All staff believe that our school should provide a caring, positive safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- 1.5 The aims of this policy are:
 - 1.5.1 To support the child's development in ways that will foster security, confidence and independence.
 - 1.5.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
 - 1.5.3 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (Reference Appendices 1 and 2)
 - 1.5.4 To provide a systematic means of monitoring children known or thought to be at risk of physical and mental harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
 - 1.5.5 To emphasise the need for good levels of communication between all members of staff.
 - 1.5.6 To develop a structured procedure within the school to be followed by all members of the school community in cases of suspected abuse.
 - 1.5.7 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
 - 1.5.8 To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory CRB/ DBS check (according to guidance)², and a central record is kept for audit.

2.0 Safe School, Safe Staff

- 2.1 We will ensure that:
 - 2.1.1 All members of the governing body understand and fulfil their responsibilities, namely to ensure that:
 - there is a Child Protection policy together with a Staff Code of Conduct policy.
 - the school operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training
 - the school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
 - a senior leader has Lead Safeguarding responsibility
 - on appointment, the Designated Safeguarding Lead (DSL) undertake interagency training and also undertake DSL 'new to role' and an 'update' course every 2 years
 - all other staff have Safeguarding training updated as appropriate
 - any weaknesses in Child Protection are remedied immediately

² Guidance regarding CRB checks recently updated by the Protection of Freedoms Act 2012

- a member of the Governing Body, usually the Chair, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher
 - Child Protection policies and procedures are reviewed annually and that the Child Protection policy is available on the school website or by other means
 - the Governing Body considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through sex and relationship education (SRE).
 - that enhanced DBS checks are in place for Chairs of Governors of independent, academies, non-maintained special schools
- 2.1.2 The Designated Safeguarding Lead, Matt Blayney, is a member of the Senior Leadership Team. His Deputy is Sharon McCormick who is also the Domestic Abuse and Child Sexual Exploitation Lead. They are supported by a wider Safeguarding Team who have all been trained to Safeguarding Level 3. They have undertaken the relevant training followed by biannual updates, and these roles are explicit in their job descriptions.
- 2.1.3 SLT involved in recruitment and at least one member of the governing body will complete safer recruitment training to be renewed every 5 years.
- 2.1.4 All members of staff and volunteers are provided with child protection awareness information at induction, including the school safeguarding policy so that they know who to discuss a concern with.
- 2.1.5 All members of staff are trained in and receive regular updates in e-safety and reporting concerns.
- 2.1.6 All members of staff are trained to identify concerns early to prevent them from escalating; provide a safe environment in which children can learn; identify children who may benefit from early help; know what to do if a child tells them he/she is being abused or neglected and, follow the referral process if they have a concern.
- 2.1.7 All other staff and governors, have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- 2.1.8 All members of staff, volunteers, and governors know how to respond to a pupil who discloses abuse through the information leaflet issued at Reception.
- 2.1.9 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Safeguarding and Child Protection Policy, and reference to it in our Parents' Handbook.
- 2.1.10 Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.
- 2.1.11 Community users organising activities for children are aware of the school's child protection guidelines and procedures.
- 2.1.12 We will ensure that child protection type concerns or allegations against adults working in the school are referred to the LADO³ for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS)⁴ for consideration

³ LADO Local Authority Designated Officer for allegations against staff. AEO Area Education Officer

⁴ Contact the LADO for guidance in any case

for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.

- 2.2 Our procedures will be regularly reviewed and updated.
- 2.3 The name of the designated members of staff for Child Protection, the Designated Safeguarding Leads, will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- 2.4 All new members of staff will be given a copy of our child protection policy, with the DSLs' names clearly displayed, as part of their induction into the school.
- 2.5 The policy is available publicly either on the school website or by other means. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the parental handbook and school's website.

3.0 Responsibilities

- 3.1 The designated DSLs are responsible for:
 - 3.1.1 Referring a child if there are concerns about possible abuse, to the Local Authority, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing or email using the Family Operations Request for Support form.
 - 3.1.2 Keeping written records of concerns about a child even if there is no need to make an immediate referral.
 - 3.1.3 Ensuring that all such records are kept confidentially and securely and are separate from pupil records, until the child's 25th birthday, and are copied on to the child's next school or college.
 - 3.1.4 Liaising with other agencies and professionals.
 - 3.1.5 Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
 - 3.1.6 Ensuring that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
 - 3.1.7 Organising child protection induction, and update training every year, for all school staff with an annual refresher training session.
 - 3.1.8 Providing, with the Headteacher, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children on the child protection register (anonymised).

4.0 Supporting Children

- 4.1 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self - worth.
- 4.2 We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

- 4.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.4. Our school will support all children by:
 - 4.4.1 Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
 - 4.4.2 Incorporating into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse in all contexts, including:
 - How to determine whether other children, adults or sources of information are trustworthy, judge when a family, friend, intimate or other relationship is unsafe and how to seek help or advice.
 - The characteristics of positive and healthy friendships.
 - That some types of behaviour within relationships are criminal, including violent behaviour and coercive control.
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable.
 - About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removing potentially compromising material placed online.
 - What to do and where to get support to report material or manage issues online.
 - The impact of viewing harmful content.
 - That specifically explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
 - That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including imprisonment.
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, forced marriage, honour-based violence and FGM and how they can affect current and future relationships.
 - 4.4.3 How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online), promoting a caring, safe and positive environment within the school.
 - 4.4.4 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
 - 4.4.5 Notifying Social Care as soon as there is a significant concern.
 - 4.4.6 Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.

5.0 Confidentiality

- 5.1 We recognise that all matters relating to child protection are confidential.
 - 5.2 The Headteacher or DSLs will disclose any information about a child to other members of staff on a need to know basis only.
 - 5.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
 - 5.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
 - 5.5 We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm; or impede a criminal investigation. If in doubt, we will consult with Essex Initial Response Team on this point.
-

6.0 Records and Information Sharing

- 6.1 Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 and GDPR places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Students' personal data should not be shared where the 'serious harm test' is met ie where releasing data will or may result in harm to the child. In these cases independent legal advice should be sought.
- 6.2 Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern held about a child or children within our school, the status of such records and when these records should be shared with other agencies.
- 6.3 Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will make an accurate record as soon as possible noting what was said or seen (if appropriate, using a body map to record), giving the date, time and location. All records will be dated and signed and will include the action taken. This is then submitted via CPOMS to the Designated Safeguarding Lead (or deputy), who will decide on appropriate action and record this accordingly.
- 6.4 Any records related to child protection are kept in an individual child protection file for that child (which is separate to the pupil file) in chronological order. All child protection records are stored securely and confidentially and will be retained for 25 years after the pupil's date of birth. (Current guidance is under review and files are now kept indefinitely).
- 6.5 Where a pupil transfers from our school to another educational provision, their child protection records will be forwarded to the new educational setting. These will be marked 'Confidential' and for the attention of the receiving school's Designated Safeguarding Lead, with a return address on the envelope so it can

be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new school and then destroy any copies held in our school.

- 6.6 Where a pupil joins our school, we will request child protection records from the previous educational establishment (if none are received).

7.0 Supporting Staff

- 7.1 We recognise that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 7.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

8.0 Allegations against staff including supply staff

- 8.1 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 8.2 All Staff should be aware of Essex LA's Guidance on Behaviour Issues, and the school's own Behaviour Management policy.
- 8.3 Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction
- 8.4 We understand that a pupil may make an allegation against a member of staff.
- 8.5 If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher.
- 8.6 The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO): 03330 139797 or lado@essex.gov.uk
- 8.7 If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult as in 7.6 above, without notifying the Headteacher first. The Chair of Governor's contact details can be obtained from the school office.
- 8.8 The school will follow the Essex LA procedures for managing allegations against staff. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.
- 8.9 Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and Personnel Consultant in making this decision.
- 8.10 In the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of Governors with advice as in 8.8 above.
- 8.11 We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

9.0 Whistle-blowing – see also the Staff Code of Conduct 5.1

- 9.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 9.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/LADO following the Whistleblowing Policy.
- 9.3 Whistleblowing re the Headteacher should be made to the Chair of the Governing Body whose contact details are readily available to staff.

10.0 Physical Intervention – see also the Physical Restraint Policy

- 10.1 We acknowledge that staff must only ever use physical intervention or restraint as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.
- 10.2 Such events should be recorded and signed by a witness.
- 10.3 Staff who are likely to need to use physical intervention will be appropriately trained in the restraint techniques.
- 10.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- 10.5 We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance in the Staff Code of Conduct to ensure they are clear about their professional boundary.⁵

11.0 Peer on Peer abuse – see also Anti-Bullying Policy

- 11.1 Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms eg. cyber, racist, homophobic and gender related bullying. We keep a record of reported bullying incidents. All staff are aware that children with SEND and / or differences / perceived differences are more susceptible to being bullied / victims of child abuse.
- 11.2 Peer on peer abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting part of the Voyeurism (Offences) Act, April 2019) and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. We do not

⁵ 'Guidance on Safer Working Practices is also available on the DfE website

tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our school understands the different gender issues that can be prevalent when dealing with peer on peer abuse. All peer on peer abuse is dealt with according to the school's anti-bullying / Child Protection procedures and the police / social care involved as appropriate.

All forms of peer on peer abuse are unacceptable and will be taken seriously. We have a zero-tolerance approach to abuse.

The school will therefore:

- 11.3 Create a whole school protective ethos in which peer on peer abuse, including sexual violence and sexual harassment will not be tolerated.
- 11.4 Provide training for staff about recognising and responding to peer on peer abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- 11.5 Ensure that staff do not dismiss instances of peer on peer abuse, including sexual violence and sexual harassment, as an inevitable part of growing up, banter, "just having a laugh" or "boys being boys".
- 11.6 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 11.7 Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- 11.8 Ensure that staff members follow the procedures outlined in this policy when they become aware of peer on peer abuse.
- 11.9 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

12.0 Sexual Violence and Harmful Sexual Behaviours – see Harmful Sexual Behaviours policy

- 12.1 Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 12.2 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The school will:

- 12.3 Be clear that sexual violence and sexual harassment will not be tolerated.
- 12.4 Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 12.5 Make decisions on a case-by-case basis.

- 12.6 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 12.7 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 12.8 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 12.9 Liaise closely with external agencies, including police and social care, when required.
- 12.10 Refer to 'Keeping Children Safe in Education - Part Five', 2021, 'Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September, 2021) for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)

13.0 Racist Incidents – see Racist Incident Policy

- 13.1 Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

14.0 Prevention

- 14.1 We recognise that the school plays a significant part in the prevention of physical and mental harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- 14.2 The school community will therefore:
 - 14.2.1 Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
 - 14.2.2 Include regular consultation with children e.g. through annual questionnaires
 - 14.2.3 Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
 - 14.2.4 Include safeguarding across the curriculum, including PSHE, and Relationships and Sex Education, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, e-safety, road safety, pedestrian and cycle training.
 - 14.2.5 Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

15.0 Health & Safety – see Health and Safety Policy

- 15.1 Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school and when undertaking school trips and visits.

15.0 Monitoring and Evaluation

15.1 Our Child Protection and Safeguarding Policy and Procedures will be monitored and evaluated by:

- Governing Body visits to the school
- Annual monitoring report for Governors
- Annual Child Protection file audit
- SLT 'drop ins' and discussions with children and staff
- Pupil surveys and questionnaires
- Scrutiny of Attendance data
- Scrutiny of range of risk assessments
- Scrutiny of LGB minutes
- Logs of bullying/racist/behaviour incidents for SLT and LGB to monitor
- Review of parental concerns and parent questionnaires

This policy also links to our policies and procedures on:

Behaviour

Staff Code of Conduct (5.1: Whistleblowing; 7: ESafety, including staff use of mobile phones)

Confidentiality

Anti-bullying

Health & Safety

Allegations against staff

Parental concerns

Attendance

Curriculum

PSHE

Administration of medicines

Drugs Education

Sex and Relationships Education

Physical intervention

Risk Assessment

Recruitment and Selection

Child Sexual Exploitation: see Appendix 1

Intimate Care

Appendix 1

Recognising signs of Child Abuse

All staff should be aware that safeguarding incidents and / or behaviours can be associated with factors outside the school and can occur between children outside of school. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Categories of Abuse

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

Signs of Abuse in Children

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

Updated September 2021

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby.
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding.
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g. belt marks, hand prints or a hair brush.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Fabricated illness

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

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The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Domestic Abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are ‘personally connected’ regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

SWCHS staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Encouraging children to watch pornographic materials or sexual acts between adults constitutes sexual abuse.

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Peer on Peer Abuse

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour. Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

'Sexting' and the use of Mobile Technology

The circulation of pornographic images by mobile technology or the internet can in many situations constitute a criminal offence. It is an offence to send by means of a public electronic communications network, a message or other matter that is grossly offensive, indecent, obscene or menacing. By having in their possession, or distributing, indecent images of a person under 18 on to someone else - young people may not aware that they could be breaking the law as these offences under the Sexual Offences Act 2003

The making and distribution by mobile technology of images of a person in a state of undress is referred to as 'sexting' and is often inadvertently entered into by children who are trying to establish relationships with others of a similar age. In some cases children, particularly girls, are coerced into sending provocative or indecent images or videos of sexual acts. These can easily be distributed amongst large groups of other young people and can quickly end up in the hands of paedophiles.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
 - Understanding what is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society's standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsible with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school

- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Child Exploitation including Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) SWCHS CE Lead is Sharon McCormick.

Both CSE and CCE are forms of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/ or take place online.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual or criminal exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- injuries from physical assault, physical restraint or sexual assault
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime

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- police involvement, police records
- involved in gangs, gang fights, gang membership

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern that is also a safeguarding concern, IMMEDIATE action should be taken, and the usual procedures followed.

Appendix 2

Procedures for responding to Child Protection Concerns at SWCHS

Principles

This school takes seriously its responsibility to protect and safeguard the welfare of the children and young people in its care.

As part of the ethos of the school, the staff and governors are committed to:

- Encouraging and supporting parents/carers and working in partnership with them
- Listening to and valuing the pupils
- Ensuring all staff, both teaching and support, are aware of signs and symptoms of abuse, know the correct procedure for referring concerns or allegations and receive appropriate training to enable them to carry out these requirements.
- Maintaining a safe school environment for all pupils
- Exercising their duty to work in partnership with other agencies and to share information with them.

We recognise that teachers and support staff, because of their contact with and knowledge of the children or young people in their care, are well placed to identify abuse and offer support to children in need.

The school recognises it is an agent of referral and not of investigation.

Procedures for Referral (see also attached 'Child Protection Guidelines for staff': Appendix 4)

All action is taken in line with the following guidance:

- Keeping Children Safe in Education (DfE 2021)
- The Children Act 1989 and 2004
- Essex Local Authority audit tools and guidance
- Family Operations Hub guidelines for referral
- D of H guidance, Working Together to Safeguard Children (2013)

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- Section 175 of the Education Act 2002

Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that abuse may have occurred **must** report it immediately to the Designated Safeguarding Lead (Matt Blayney) or if unavailable to the Deputy Designated Safeguarding Lead (Sharon McCormick). In the absence of either of the above the matter should be brought to the attention of the most senior member of staff.

The DSL **may** seek initial advice from the Family Operations Hub by asking for the **Consultation Line**, or, where the child is in immediate danger, can immediately make a referral by asking for the **Priority Line**: telephone: **0345 603 7627** (out of hours: 0345 606 1212)

Referrals should be made in writing or email using the Family Operations Request for Support form accessible via the portal: www.essexeffectivesupport.org.uk click on the link for 'requesting support'. Essential information will include pupil's name, address, date of birth, family composition, reason for the referral, name of person receiving the referral and any advice given. This written confirmation must be signed and dated by the referrer.

To refer non-urgent CP issues or to access Family Solutions support you need to complete a request for support form.

Confidentiality must be maintained and information relating to individual pupils/families shared with staff on a strictly need to know basis.

Alleged abuse by staff

When concerns or allegations involve members of staff, the procedure for referral stated above remains the same. The DSL must be informed and the DSL will liaise with the Headteacher and Mark Norman (SLT for staffing). In addition, the Essex Safeguarding Team will need to be informed (01245 436744) and the Essex LADO (03330 139797). If the concerns or allegations involve the DSL they should be reported to the Headteacher, unless they are the Headteacher, in which case they must be reported directly to the designated governor for child protection who will make the referral to Social Services and to Safeguarding – Barbara Calland is the Safeguarding Governor and her details are to be found in the Staffroom on Teams.

This Child Protection Policy should be read in conjunction with the school's Physical Restraint/ Intervention Policy.

Concerns by staff that safeguarding issues are not being dealt with appropriately by the Safeguarding Team

If a staff member has a concern that the DSL, Deputy DSL or members of the safeguarding team are not following up concerns in an appropriate manner then they should report this immediately to the Headteacher or Executive Headteacher.

If they have serious concerns they should contact the Essex LADO (03330 139797). There are four LADOs for Essex who work on a shift pattern. The names of the Essex LADO can be found at https://schools.essex.gov.uk/pupils/Safeguarding/Managing_allegations_in_the_Childrens_Workforce/Pages/ManagingAllegationsInTheChildrensWorkforce.aspx

The duty email address of the LADO is: lado@essex.gov.uk

Record Keeping

Any member of staff receiving a disclosure of abuse, or noticing possible abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event into context and giving the date, time and location.

All records relating to child protection concerns will be kept in a secure place and will remain confidential. They do not form part of the pupil's educational records and are not required to be disclosed to parents/carers except by agreement.

All referrals should be recorded on CPOMS. If the system is down then the school will temporarily revert to the Pink Logging Forms held in most large offices around the school.

THINK PINK BUTTON – complete a referral using CPOMS.

Parental Involvement

This school is committed to helping parents/carers understand its responsibility for the welfare of all pupils.

Parents/carers will be made aware of the school's child protection policy via the school prospectus and initial meetings with parents of new pupils.

Where possible, concerns should be discussed with parents/carers and the designated person should seek agreement to making referrals, unless to do so would place the pupil at increased risk of significant harm, or if advised against doing so by a member of the Initial Response Team.

Training

The DSL and his/her deputy will be encouraged to attend DSL training events as appropriate and receive Level 3 training every two years.

DSL Level 3 Refresher Training:

Matt Blayney, 27th August 2020, Cambridgeshire County Council Education Safeguarding Team.

Sharon McCormick, 18th January 2021, Cambridgeshire County Council Education Safeguarding Team.

Sharon McCormick, 27th April 2021, Briefing for new DSLs, Essex County Council Safeguarding Team.

Level 3 Safeguarding Training:

Jo Chapman, June 2018, Cambridgeshire County Council Education Safeguarding Team. (Refresher completed)

Polly Lankester, 18th/19th November 2020, Cambridgeshire County Council Education Safeguarding Team.

Paul Singh, 18th/19th November 2020, Cambridgeshire County Council Education Safeguarding Team.

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Katie Pieri, 3rd/4th December 2020, Cambridgeshire County Council Education Safeguarding Team.

Anna Bendall, 3rd/4th December 2020, Cambridgeshire County Council Education Safeguarding Team.

Dan Crittenden, 3rd/4th December 2020, Cambridgeshire County Council Education Safeguarding Team.

Designated Teacher for Looked After Children Training:

Katie Pieri, November 2020, Essex County Council Safeguarding Team.

Katie Pieri, 18th May 2021, Looked After Children Monitoring Review, Essex County Council.

Domestic Violence and Abuse Training:

Sharon McCormick, 14th January 2021, Understanding Domestic Violence and Abuse, Levels 1 & 2, Against Violence and Abuse (AVA).

Sharon McCormick, February 2021, Familiarisation with MARAC Toolkit, Essex County Council Safeguarding Team.

Sharon McCormick, April 2021, DV Practice Guidance and Webinar for Social Workers, British Association of Social Workers.

Harmful Sexual Behaviours Training:

Matt Blayney, 5th December 2019, Managing Sexualised Behaviours in Secondary Schools, NSPCC

YACs/SSOs, 16th December 2019, Managing Sexualised Behaviours in Secondary Schools, Matt Blayney

Child Sexual Exploitation (CSE) Lead Training:

Sharon McCormick, January 2019, Essex County Council Safeguarding Team.

Sharon McCormick, 28th April 2021, Child Exploitation Champions Forum, Essex County Council Safeguarding Team.

Child Exploitation (CE) Champion Forums:

Sharon McCormick, 13th October 2021, 23rd February 2022 and 11th May 2022,

FGM training:

Sharon McCormick, 4th January 2021, Home Office

Children's Mental Health Champion Training:

Sharon McCormick, 7th October – 17th November 2020, Place2Be

Suicide Prevention Training:

Matt Blayney, November 2018, Cambridgeshire County Council Education Safeguarding Team.

Sharon McCormick, March 2019, Essex County Council Safeguarding Team.

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Safer Recruitment Training:

All SLT, November 2019.

PREVENT training:

Matt Blayney, July 2017, Essex County Council

Basic Safeguarding and Child Protection Training (Full):

All new staff, September 2020

Basic Safeguarding and Child Protection Training (Refresher):

All existing staff, September 2020.

In both cases of Basic Safeguarding and Child Protection Training a Office 'Form' was sent for all staff to complete confirming they had undertaken the training, read KCSiE (2021), and this was then used to update the Single Central Record (SCR).

New starters were given access to the Basic Safeguarding and Child Protection Training and confirmed via email that they had received the training. This was then used to update the SCR.

CPOMs training:

Safeguarding Team, January 2021

Pastoral Team, April 2021

Whole staff, 7th June 2021

Challenging Pre-conceptions Training:

Whole staff, 7th June 2021

The Role of the Local Governing Body

The governors will receive an annual report on changes to child protection policy or procedures; training undertaken by the designated person, other staff and governors; the number of child protection incidents/cases (without detail or name); and the place of child protection issues in the curriculum.

The Chair of Governors (or designated governor for child protection, if they are not the chair), in liaison with the designated person, will ensure that the school has a child protection policy and procedures in place, and that these are known to all members of staff.

Child Protection training for Governors took place in September 2020 and was delivered by Cambridgeshire County Council.

Statement for inclusion in the Parents' Handbook which is issued annually:

Child Protection and Safeguarding

Our first concern is your child's welfare, and therefore there may be occasions when our concern about your child means that we have to consult other agencies before we contact you. The procedures

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we follow have been laid down by the Education Safeguarding Service. If you want to know more about this procedure, please speak to Mr Blayney, Deputy Headteacher: Designated Safeguarding Lead.

Appendix 3

Honour Based Abuse, Forced Marriage and Female Genital Mutilation

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

All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to Matt Blayney or Sharon McCormick and **THINK PINK BUTTON – complete a referral on CPOMS**. We all need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Breast Ironing

Breast Ironing also known as 'Breast Flattening' is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education.

Forced Marriage (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly but refer to Matt Blayney, Deputy Headteacher and the school's Designated Safeguarding Lead, or his deputy, Sharon McCormick, Deputy Designated Safeguarding Lead.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK and a form of child abuse with long-lasting harmful consequences.

What is FGM?

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Makes childbirth easier
-

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM
Countries where FGM is practised include: Kenya; Senegal; Gambia; Mali; Malaysia; Egypt; Nigeria; Eritrea; Yemen; Afghanistan; Kurdistan; Iraq; Somalia; Pakistan; Indonesia; Sri Lanka; India; Sierra Leone; Colombia; Sudan; Oman.
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group

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- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' Rule

As with Forced Marriage there is the 'One Chance' rule **for FGM**. It is essential that action is taken **without delay as FGM cannot be undone**.

FGM mandatory reporting duty: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)

If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18, the teacher must **personally** report this to the police. A member of the Safeguarding Team will assist individual teachers with contacting the police.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's Designated Safeguarding Lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should report their concerns or suspicions via a referral on CPOMS.

Non-teachers should report all concerns – where FGM has been carried out, there is a suspicion that FGM has been carried out or where a girl is at risk of FGM - via **a referral on CPOMS. Canteen staff will continue to use the Pink Form.**

You can contact the Essex Police to discuss any concerns on 101 or report a crime using the Essex Police online reporting portal found here:

<https://www.essex.police.uk/ro/report/ocr/af/how-to-report-a-crime/>

Appendix 4

Supporting Children (including specific areas of concern)

SWCHS recognises that **any** child may be subject to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and as such will support all children by:

- Providing curricular opportunities to encourage self-esteem and self-motivation including a robust PSHE programme which tackles areas of concern in an age appropriate way.
- Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- Applying the 'SWCHS Behaviour Approach' effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The school will ensure that the pupil knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
- Liaising with other agencies which support the pupil such as Social Care, Family Solutions, Frontline Early Help portal, the Child and Adolescent Mental Health Services (CAMHS), the NHS Emotional Wellbeing and Mental Health Service (EWMHS), Community School Nurse, Uttlesford Safeguarding Officer or Early Help Teams.
- Developing productive and supportive relationships with parents/carers.
- The school recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for those:

Children with Disabilities, Additional Needs or Special Educational Needs

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

We understand that children with special educational needs (SEN) and / or disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration
- That they may be more prone to peer group isolation than others
- The potential to be disproportionately impacted by things like bullying, without outwardly showing signs
- Communication difficulties in overcoming these barriers

The school has pupils with emotional and behavioural difficulties and/or challenging behaviours. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum, staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that these skills can be supported at home. We will also annually deliver a safeguarding assembly to ensure that all pupils are aware of how to raise a concern or disclose something that is worrying them. This assembly is delivered by the DSL or a member of the SWCHS Safeguarding Team.

The school has pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate. We are also very fortunate to have an incredibly professional and expert SEND team at SWCHS and liaison with the SENDCO as well as the SENDCO's membership of the Safeguarding Team is standard practice.

Young Carers

The school recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

SWCHS will seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise. We also have a Young Carer Lead at SWCHS who is responsible for supporting Young Carers.

Children at risk of Child Exploitation (CE)

Criminal Exploitation (CE) of children is a form of harm that is a typical feature of 'County Lines' activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. School will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The Designated Safeguarding Lead will liaise with Essex Police and/or Social Care if there is a concern that a young person may be at risk of criminal exploitation.

SWCHS recognises that young people who go missing can be at increased risk of child criminal exploitation and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

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

Sexual exploitation can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

SWCHS recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

SWCHS has a separate 'Managing Sexual Behaviours' policy which is published on our website that outlines in detail our response in managing sexual and harmful sexual behaviours involving pupils at our school.

Children Frequently Missing Education

SWCHS recognises that children going missing, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, modern day slavery, child sexual exploitation and child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The school monitors attendance of individual pupils closely, as outlined in the SWCHS Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

SWCHS endeavors to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern.

When a child is missing from education, liaises with the Essex Child Missing Education (CME) Service who have a range of interventions to support. In the case of an immediate concern around a missing child, the school will contact parents and the Police. The school will inform the Education Welfare Officer and Social Care if a missing child is subject to a Child Protection Plan or there have been ongoing concerns.

Children Misusing Drugs or Alcohol

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:

When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

SWCHS also has a 'zero tolerance' policy on illegal drugs on school site and any child caught in possession of illegal drugs may face our most serious sanctions which include permanent exclusion. Before making any such decisions, the school will liaise closely with external agencies and the Police.

Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence. When SWCHS receives information about drug and alcohol abuse by a child's parents/carers we will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children.
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers.
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour.
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance.
- Disturbed moods as a result of withdrawal symptoms or dependency.
- Unsafe storage of drugs and/or alcohol or injecting equipment.
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child.

Children Living with Domestic Abuse (DA)

Domestic Abuse (DA) is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional.

SWCHS recognises that where there is DA in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring

harm, which they may carry with them into their adult life and relationships. DA can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of DA arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

At SWCHS we are working in partnership with Essex Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

In order to achieve this, Essex Police will share information of all domestic incidents, where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead. The DA Lead for SWCHS is Sharon McCormick.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL at SWCHS holds regular meetings with the Uttlesford District Council (UDC) Safeguarding Officer who is aware of any homelessness affecting families or children in the local area. If SWCHS were to learn of a child who is homeless or at risk of being homeless then a referral will be made to UDC and Essex Social Care in order to support access to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As always, early help is key and SWCHS encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. SWCHS also recognises that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. In such cases SWCHS will seek support from Essex Social Care.

Appendix 5

Child Protection Guidelines for Staff for inclusion in the Teachers' Handbook and issued to all staff annually

(Teaching and Non-Teaching)

We have a "duty in law" to act upon concerns/information received concerning child protection issues. These may include accidental injury, neglect, ill treatment or sexual abuse. It is extremely important that every member of staff (teaching and non-teaching) is aware of the procedures they might need to adopt and the personnel who are directly involved.

Procedure in the case of disclosure

Disclosure is when a child openly informs you about incidents of this nature which they claim to have experienced. If a child discloses directly to you, the procedure you should follow is laid out below:

- Once a pupil has disclosed **do not question them in great depth over matters of detail** but immediately contact **Matt Blayney, Designated Safeguarding Lead or his Deputy, Sharon McCormick. As soon as possible make a written report of the disclosure and hand to either Matt Blayney or Sharon McCormick.** Please make all referrals using CPOMS. As a back-up Child Protection **pink referral forms** are kept in Area and Year offices.
- **Matt Blayney or Sharon McCormick** take responsibility for the decision as to whether or not Initial Response are contacted **and makes any contact themselves.** It is very important that we do not have different people liaising with the Family Operations Hub/ Social Care over different cases. In the absence of both please contact another senior member of staff.

Procedure in the case of suspicion

In the case of suspicion, things are much less clear-cut but it is important that members of staff alert relevant colleagues if they have worries in this area. If you are concerned that a child in your care is at risk in some way then it is important that you:

- Complete a **referral using CPOMS** and allocate to **Matt Blayney or Sharon McCormick**, who will liaise with the Year Achievement Coordinator or another CP trained colleague as appropriate.
- The Year Achievement Coordinator should **liaise with Matt Blayney** and the Form Tutor/ other colleagues as appropriate.
- If it is felt that there is sufficient cause for concern then the same procedure as for disclosure should be followed (see above).
- **Matt Blayney or Sharon McCormick** still retain the responsibility for contacting Police/ Social Care if it is deemed appropriate.

Appendix 6

PREVENT Anti-radicalisation

As of July 2015, the Counter-Terrorism and Security Act (HMG, 2015) placed a new duty on schools and other education providers. Under section 26 of the Act, schools are required, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

This duty is known as the PREVENT duty.

It requires schools to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion
- be safe spaces in which children / young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues

CHANNEL is a national support programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Our staff understand how to identify those who may benefit from this support and how to make a referral.

PREVENT Safeguarding Objectives: a national initiative

Within this overall framework the Prevent strategy will specifically:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- work with sectors and institutions where there are risks of radicalisation which we need to address.

Schools can help to protect children from extremist and violent views in the same ways that they help to **safeguard children** from drugs, gang violence or alcohol.

The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. Awareness of Prevent and the risks it is intended to address are both vital. Staff can help to identify, and to refer to the relevant agencies, children whose behaviour suggests that they are being drawn into terrorism or extremism.

Schools of all kinds can play a role in enabling young people to explore issues like terrorism and the wider use of violence in a considered and informed way. Schools can facilitate understanding of wider issues within the context of learning about the values on which our society is founded and our system of democratic government. These are important for reasons which go far beyond Prevent but they connect to the Prevent agenda.

PREVENT referrals should be reported in line with other safeguarding procedures.

All action is taken in line with the guidance provided in the HM Government Document:

'Workshop to Raise Awareness of Prevent'.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views.

PREVENT is part of the UK's counter-terrorism strategy. preventing people from becoming radicalised and involved in terrorism or supporting terrorism. It also covers involvement with other groups which could be considered extreme: ISIL, Animal Rights, Environmental, terrorism related to Northern Ireland.

As a school we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. At SWCHS all staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

As a school we need to follow the **NOTICE, CHECK, SHARE** principles from the PREVENT initiative.

As a school, we must **NOTICE** the vulnerabilities which might be exploited by extremist organisations:

- difficult personal circumstances (relationship breakdown, family issues)
- financial concerns or concerns regarding unemployment
- changes in friendship groups
- difficult experiences linked to their faith (i.e. victim of racist comments, sense of guilt, injustice, grievance)
- issues with drugs / alcohol
- lack of parenting (neglect, no boundaries / curfews)
- personality traits (low self-esteem)
- lack of knowledge / education; naïvety
- social exclusion
- inappropriate use of social media / TV / video games (exposure to violence and propaganda)
- peer pressure
- mental health

As a school, we must also **NOTICE** the signs which might indicate that a member of our community is becoming involved in an extremist organisation:

- changes in friendship groups
- changes in behaviour at school (language, emotions, paranoia, fixated on a subject, withdrawn, depressed)
- references to weapons or violence
- changes in appearance (clothing, uniform, personal appearance, tattoos)
- changes in routine or absence from school (lengthy or unexplained trip abroad)

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- student talks about a specific individual (perhaps an influential figure with strong views), political issues or global events in a concerning way
- comments or views expressed in work done which give cause for concern (e.g. inflammatory comment, extreme religious or political statement)
- comments about what students are going to do in the future after leaving school which give cause for concern

Any staff with concerns regarding a member of our community should then CHECK these concerns by referring to Matt Blayney, Deputy Headteacher and Designated Safeguarding Lead, and who is the school's PREVENT Lead.

The referral will be considered and information sought from SWCHS colleagues. If appropriate, the PREVENT Lead will SHARE this with the quadrant Prevent Champion:

West Quadrant: Sue McCann sue.mccann@essex.gov.uk

She will then decide whether they should be referred to channel. The referral form is available on www.escb.co.uk and should be emailed to PREVENT@essex.pnn.police.uk.

You can contact the Essex Police to discuss any concerns on

PREVENT@essex.pnn.police.uk

DC Rachael Harris Tel: 01245 452196

Essex Police: 101

Confidential anti-terrorist hotline number: 0800 789 321

Appendix 7

Privately Fostered Children or Children who have Family Members in Prison

Privately Fostered Children

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The school will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

Children who have Family Members in Prison

The school is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child. The school recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

The school will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The school will work with the family and the child to minimise the risk of the child not achieving their full potential.

Appendix 8

Preventing unsuitable adults from working with children

The school will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education', 2021. This section should be read in conjunction with the school's Safer Recruitment Policy.

The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The following members of staff have undertaken Safer Recruitment training

Polly Lankester
Matt Blayney
Catherine Davis
Mark Norman
Jackie King

Allegations that may meet the harms threshold

Any allegation of abuse made against a member of staff (including supply staff and volunteers) that meets the harms threshold as set out in Keeping Children Safe in Education, 2021, Part Four, Section One, will be reported straight away to the Head Teacher or Principal.

In cases where the Head Teacher or Principal is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2021.

The school will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, volunteer or agency/supply staff and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2021 *and the school's HR Policies, and seek advice from their HR provider.*

The Headteacher or Chair of Governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Where the school or college identify a child has been harmed they should contact children's social care and as appropriate the police immediately.

SWCHS will consider:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.

- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The school will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations that do not meet the harms threshold

Low level concerns that do not meet the harms threshold should be reported to the Headteacher/Principal. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

In cases where the Head Teacher or Principal is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2021.

The school/college will deal with any such concern, no matter how small, where an adult working in or on behalf of the school or college may have acted in a way that:

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

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

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

SWCHS will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

SWCHS will ensure that **all** staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within our

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Code of Conduct. As part of the Induction process, all staff, paid and unpaid, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

All staff have signed to confirm that they have read 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019).

The school will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).