



**POLICY:** Child Protection and Safeguarding Policy

**STATUTORY:** Yes

**DATE AGREED:** July 2023

**REVIEW DATE:** July 2024

**RESPONSIBLE MEMBER OF STAFF:** Mr A Williams

**GOVERNOR COMMITTEE:** Personnel and Welfare/FGB

**SIGNED HEADTEACHER:** A.Evans

**SIGNED CHAIR OF GOVERNORS:**



| ROLE/ORGANISATION       | NAME               | CONTACT DETAILS |
|-------------------------|--------------------|-----------------|
| Channel helpline        |                    | 020 7340 7264   |
| Herefordshire MASH team | Herefordshire MASH | 01432 260800    |

## 1. Aims

The school aims to ensure that:

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

## 2. Legislation and statutory guidance

Fundamentally this policy is rooted in the principals of the United Nations Conventions on the Rights of the Child which makes it clear that a child has a right to be protected from abuse and neglect (Article 19) and sexual exploitation (Article 34). There is also an acknowledgement to a range of other fundamental rights including those to freedom of thought, expression, privacy, education and conscience.

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2019\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

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

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Furthermore this policy has been developed in accordance with the principles of the following documents:

- The Education Act 2002 s175/s157;

- Equalities Act 2010
- Dealing with Allegations of Abuse (DfE 2012);
- Sexual Violence and sexual harassment between children in schools and colleges May 2018
- Children missing education: statutory guidance for local authorities Sept 2016
- Criminal exploitation of children and young adults: Home office County Lines guidance Sept 2018
- Revised Prevent duty guidance for England and Wales updated April 2019
- UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017) plus Government guidance on advice for education settings on sharing nudes and semi nudes (2020)
- Child Act 1989: Private Fostering guidance
- Teaching online safety in school (DfE 2019)
- Statutory guidance on Relationships education, Relationship and Sex Education (RSE) and Health education (DfE 2020)
- Mental health and behaviour in schools (DFE 2018)
- Home Office guidance on Preventing youth violence and gang involvement (2013).
- Farrer & Co Peer on Peer abuse toolkit (2019)
- Searching, screening and confiscation advice for Headteachers (DFE JAN 2018)
- Use of reasonable force; Advice for Headteachers and Governing bodies (JULY 2013)
- European Convention on Human Rights Act and in particular Articles 3, 8,14 and Protocol 1 Article 2 which lay out all our rights in terms of freedom from inhuman and degrading treatment, discrimination and respect for private and family life. Protocol 1 stresses the individuals' right to an education

- This policy also incorporates guidance from agencies such as CEOP and the NSPCC
- **All the above documents and the regional implementation are found at:**  
<http://westmidlands.procedures.org.uk/>
- This policy also operates since 2019 within the new arrangements for Herefordshire and its safeguarding partnership board known as “Safeguarding Children and Young People in Herefordshire” <https://herefordshiresafeguardingboards.org.uk/news/new-childrens-safeguarding-arrangements/>. It is the responsibility of this group and the safeguarding in education sub group to consider safeguarding issues, discuss new developments, share good practice, identify priorities and provide a network for safeguarding professionals in Herefordshire settings. The work of this group will help form this and future policy and JMHS will seek to play as an active role as possible in its work.
- The details of the framework for providing effective support for children, young people and families is available in the “Right Help Right Time” document produced by the Herefordshire Safeguarding Children Partnership published Nov 2020 (reviewed Sept 2022). The guidance includes details of the Continuum of Need for young people in Herefordshire identifying 4 levels of NEED (Universal, Additional, Intensive and Specialist).
- <https://herefordshiresafeguardingboards.org.uk/herefordshire-safeguarding-children-partnership/for-professionals/right-help-right-time-levels-of-need>.

### 3. Definitions

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

- Protecting children from maltreatment
- Preventing impairment of children’s health or development (including mental health)
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- Taking action to enable all children to have the best outcomes

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

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

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

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

**Victim** - This policy may refer to the term victim for those subject to abuse or alleged abuse but recognizes that not every victim will perceive themselves as such.

**Perpetrator** - This term should always be used with caution when addressed at an alleged abuser as in many cases the abusive behavior in question will also be harmful to the perpetrator and victim.

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

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

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

**Contextual Safeguarding:** The school accepts the importance of considering the wider environmental factors in our students' lives that may threaten their safety and welfare, this is referred to as contextual safeguarding. The school acknowledges the specific contextual risks that are specific to our location in terms of possible access to "county lines" drug use, rural isolation and its impact on mental health, economic exploitation within rural and service economy, problematic public areas and their tendency to attract anti-social behaviour, rural deprivation and possible violent/abusive subcultures within the local community. This awareness does not detract from our core belief that any form of abuse could happen here to anyone. Currently as this policy is under review there are significant concerns in the following areas although staff should remain vigilant to all other possible high-risk scenarios and environments.

- Anti-social and possible gang/hazing type behaviour particularly out of school hours on the towns Recreational ground and derelict buildings
- A small group of students using rail connections out of the town to "abscond" and potentially put themselves at risk of anti-social and harmful sexual behaviours in Malvern, Worcester or Hereford
- The use of Class C and possibly B drugs and the potential risk of CSE in the form "county lines" again centered but not wholly around the towns recreational ground
- The existence and exchanging of "Youth produced sexual images" and the repercussions thereof plus a sometimes-misogynistic undercurrent that runs alongside some of these behaviours
- The open nature of the site and its proximity to town centre leading to the potential for truancy out of school particularly of high-risk students. Plus increases the risk of ex-students, parents and others known to be risk factors accessing students

- In the summer term the opening up of the whole school site and fields to students poses increased risks of students engaging in a range of unsafe behaviors
- There will be several classes and groupings of students that may pose greater vulnerability for child on child abuse, for example single gender dominated classes or inclusion facilities where there may be concentrations of vulnerable young people

#### 4. Equality statement

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

We give special consideration to children who:

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

Bespoke strategy guides are created by leaders to alert teachers to especially vulnerable groups such as those listed above. These characteristics are also detailed on MyConcern profiles. All students who may be vulnerable as are result wholly or partly due to such protected characteristics should be identified by Year leaders as possibly requiring a key trusted adult in school from within or beyond the pastoral team.

#### 5. Roles and responsibilities

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

##### 5.1 All staff

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

- Our systems which support safeguarding, including this child protection and safeguarding policy, the JMHS Code of Conduct the role and identity of the designated safeguarding lead (DSL) and deputy, the behavior policy, and the safeguarding response to children who go missing from education ( and those children deemed missing IN education or absent from education)

- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment. Therefore, staff will have a good knowledge of the Herefordshire “Right Help Right Time“ framework and the 4 levels of need inherent in this
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization
- The significant risks and impacts of the online environment in posing potential harm for young people and how they can be mitigated
- The existence of Child on Child abuse prevalent at some level in all UK schools plus the structures and responses in place within school to identify and respond to such incidents including their reporting in the same manner as other safeguarding and child protection concerns
- How to use the schools My Concern online reporting platform for making referrals and keeping updated with local and national policies related to safeguarding
- All staff should also have an awareness of the impact of poor mental health on Young people and their academic and personal development, plus be aware of how to guide, signpost and advise students and parents within the school. They should be aware that concerns re poor mental health should be reported as any other safeguarding concern
- All staff should be aware and operate the correct protocol for receiving volunteers, new staff and other outside agencies into the school
- All staff are responsible for reading training updates from the DSL and completing awareness quizzes and surveys in a timely fashion
- Teaching staff in particular should seek to know and understand various levels of vulnerability within their classes in terms of CLA, PCLA status, PP and FSM status plus current safeguarding profiles, levels of trauma and ACES plus any safety plan implications for key students. Also the key vulnerabilities that can arise from LGBT and refugee status
- All staff should actively play their role in fostering a climate of transparency where concerns about colleagues and other staff members in the school community are shared appropriately and correctly
- All staff and teaching staff in particular have a role in delivering a curriculum across all subject areas including PSHRE that aims to prevent incidents of discrimination, hate crime, extremism, plus inappropriate and harmful sexual behaviours. This preventative work will help support the school’s zero tolerance approach in this area.
- All staff need to be fully aware of their responsibilities in registering any low level concerns they may have about colleagues working in the school and to disclose potential conflicts of interest and their own inadvertent actions that may lead to safeguarding issues
- All staff should be aware of their role in the ongoing monitoring and subsequent filtering of harmful online content and conduct particularly in terms of reporting any possible breaches in the system in line with online safety policy
- All staff should be fully aware and compliant with the expectations to keep timely and accurate registers of attendance and the vital role this plays in safeguarding

- All staff should be punctual to any break or lunch duty that forms part of their contract and understand that this function is vital in monitoring and reducing potential child on child abuse

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

## 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is currently Andy Williams. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. He can be contacted on 01531 631012 or via email to [andy.williams@jmhs.hereford.sch.uk](mailto:andy.williams@jmhs.hereford.sch.uk).

Where impractical to do so a member of the DSL team will be available via Teams type talk to attend meetings where their presence has been requested.

When the DSL is absent, Dean Wyatt, member of the ESLT– will act as cover. He can be contacted on 01531 631012 or via email to [dean.wyatt@jmhs.hereford.sch.uk](mailto:dean.wyatt@jmhs.hereford.sch.uk).

If the DSL and Deputy are not available any member of the school Leadership Team will act as cover (for example, during out-of-hours/out-of-term activities). For staff with access to MyConcern the contact list of staff with DSL training can be found on the home page.

Currently all Year Leaders carry updated DSL training accreditation and can assist and guide staff in conjunction with the DSL for relevant cases within their year groups. The My Concern system lists all Current DSL accredited staff on the home page.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care (MASH or Early Help Hub), Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly, cooperating in terms of providing as much detail and context about each case
- Take overview of the My Concern system and its effectiveness in flagging, prioritizing, categorising and responding to concerns
- Managing a Safeguarding improvement plan as part of the school SDP and liaising regularly with link Governor and or Chair of Governors with its progress and the monitoring of key areas of the safeguarding teams work generally
- Lead on the prompt transfer of student safeguarding files (and earlier alerts) on to new providers both at end of key stage and in year transfers
- Lead on all aspects of staff/governor training in terms safeguarding and child protection This includes the logging of this training and assessment of its effectiveness.
- Ensuring a training log for key accredited safeguarding courses is maintained
- Monitor the Head of PSHE and team on all aspects of student education for safeguarding within the PSHE/RSE curriculum and more broadly
- Have an overview with the network manager and lead online safeguarding teacher of online safeguarding strategies in relation to online CONTENT, CONTACT and CONDUCT. This includes overall responsibility for monitoring and filtering of school



- devices and networks and ensuring all stakeholders know their role in this area to deliver the DFE standards in monitoring and filtering
- Ensuring parents and other stakeholders are aware of the schools safeguarding policies and procedures
  - Ensuring that and supporting Year leaders to, respond appropriately where incidents go beyond the limits of behaviour policy and require a response in terms of Child on child abuse. Ensuring our duties and responsibilities in terms of contextual safeguarding are well understood
  - Ensure that deputy DSL and Year leaders are updating safeguarding chronologies and putting forward cases for closure regularly (plus escalating where necessary)
  - Ensuring that staff are aware of students who are deemed vulnerable and therefore have the potential to trigger (or have already triggered) a safeguarding concern. Plus, more generally make staff aware of contextual safeguarding issues and developments. This would include students who are SEND but also students experiencing mental health difficulties, those with erratic attendance patterns and those already known to and a concern of police or health authorities
  - The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
  - Enabling Student and parent voice to form a valuable input of any work in these areas plus maintain a web page on school website where safeguarding support services can be signposted
  - Work closely with Herefordshire Children's Services in terms of accessing good supervision-raising concerns appropriately where the school believes their response has not been sufficient and representing the school at local area MAG meetings and county wide conferences where appropriate
  - Ensure that communication coming into the school from outside agencies such as operation encompass files relating to impacts of domestic abuse are shared with key individuals
  - Work with and monitor the work of the school lead on Mental health, and the Designated teacher for Children Looked After and Previously looked after
  - Oversee the work of those staff with a responsibility for and take overall responsibility and accountability for the online safety policy including the filtering/monitoring systems and use of online resources in the school
  - Ensure that the Deputy DSL with responsibility for attendance is reviewing monitoring and updating responses to both Children absent from education and those Children Missing from education and that authorities are notified accordingly. This includes those students who are looking to pursue Elective Home Education
  - Meet regularly with line manager to review serious case reviews and update on the progress of the Safeguarding elements of the SDP referencing students under section 17 and 47 assessments and those where we have encompassed information and are subject to EHA's and safety plans. They should ensure that the headteacher is also fully updated
  - Work with the School Human Resources manager to ensure the effective monitoring of the single central record and on all aspects of safer recruitment in particular ensuring all panel members are suitably safeguarding trained, that references are being considered in terms of shortlisting and safeguarding questioning and that social media screening/checks are undertaken appropriately. Safer recruitment includes the exit interview process also
  - Support and oversee the School Manager and other staff managing the use of school premises for non school activities i.e currently JM Sport and the theatre space in order that all lease/hire agreements outline the expectation that govt guidance "Keeping Children Safe in out of school setting" is adhered to as a base minimum plus

there is an awareness by all involved that the school in the event of an incident will follow its own policy including contacting the LADO

- Similarly the DSL must ensure that the school is compliant with safer sourcing and coordination of Alternative Curriculum provision and that safeguarding standards are fit for purpose in any alternative setting.
- To actively seek out “student voice” and other stakeholder feedback to ensure safeguarding improvement is relevant and targeted

The full responsibilities of the DSL and deputy are set out in their job description. Other staff with DSL qualification are:

Ms Hayley Newnes (DSL accredited); Head of Year 7/ESLT for disadvantaged and extra curricular

Ms Chloe Limbrick (DSL accredited) Deputy Headteacher

Ms Amy Phillips (DSL accredited) Head of Year 10

Ms Terri Adams (DSL accredited) Head of Year 8

Mrs Val Chadney (DSL accredited) Student services support officer Years 7-11

Mr Julie Kyle (DSL accredited) Mental Health lead

Mrs Donna Fox (DSL accredited) Designated teacher for CLA and PCLA

Mrs Lana Ladler – (DSL accredited) Assistant headteacher ic Yr12 and 13

Mr Mathew Carter- DSL accreditation to be confirmed Head of Year 9

Mrs Natalie Crickett – DSL accreditation to be confirmed Sixth Form Pastoral Assistant

### **5.3 The governing board**

The governing board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The governing board will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The current designated safeguarding governor is Mr Stuart Mitchell. They can be contacted via email at The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

Governors should work with the DSL to ensure they have the correct training, information and guidance to successfully perform a strategic and quality assurance role in all aspects of safeguarding and child protection- in particularly

- The training programme for all staff and governors
- The arrangements for volunteers, contractors and visitors to the school and JM Sport
- The monitoring and filtering systems for the school network and devices
- The management and response to cases of child on child abuse
- The safer recruitment policy from vacancy advertisement to exit interview
- The updating of the schools Single Central Register
- The supervision of the DSL
- The PSHRE programme that seeks to address key safeguarding issues
- The annual Herefordshire audit of safeguarding and any action plan( section 175)
- The central importance of Safeguarding to any School Improvement Planning
- Allegations made against staff including low level concerns
- Any other aspects of this safeguarding policy or matter that may arise from incident or concern

All governors will read Keeping Children Safe in Education.

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

## 5.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring there is adequate "supervision" for the DSL in terms of Line Management, Link Governors and partnerships with other schools and providers. This supervision should ensure the quality assurance of all procedures but also the well being of staff working in often "challenging" circumstances

## 6. Confidentiality

In terms of confidentiality JMHS protocol outlines the following:

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

## 7. Recognising abuse and taking action

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

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

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral direct and record concern and your immediate actions on to My Concern

The contact number for the Herefordshire MASH team is 01432 260800. If a child is not a resident of Herefordshire please still use this contact number.

The following link may be useful:

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

When completing a MARF it is useful to consider the following guidelines

- 1 Try where appropriate to articulate and present the views of the child
- 2 Be clear about the consent or lack of consent from parents and why
- 3 Outline any significant context or brief family history that may be relevant
- 4 Be clear on what needs to change or be addressed
- 5 Record/register other services already working with a family
- 6 ensure you are completing the most updated MARF form on website and you are using the local authority to which the student and or their family reside

## 7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. When completing reports on My Concern ensure language is objective. You may wish to show on a body map, particular injuries or concerning marks. You may also wish to scan and attach statements, images and your own notes on to the My Concern file
- Sign and date the write-up and pass it on to the DSL or alternatively upload reports on to the My Concern system. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Please note that as a "trusted user" on the My Concern system you will be able to access and update any concern which you have instigated. You may be added to a "Team" by the DSL and tasked with follow up tasks. If this is the case you will be notified through the My Concern system
- Staff will be notified automatically through My Concern via an email when a case/concern has been "picked" by the DSL and when that case has been resolved/filed. If staff are in any doubt that the concern has not been acknowledged, they should contact the DSL. **STAFF SHOULD NOT RELY ON MY CONCERN AS A WAY OF ALERTING THE DSL OF CASES WHERE A CHILD IS IN IMMEDIATE DANGER.** They should alert DSL wherever possible in person

It is important to note that many children may not feel ready or know how to tell someone that they may be being abused or neglected. This could be due to a certain vulnerability, disability, sexual orientation or another factor. A lack of disclosure should

not prevent staff from having a professional curiosity and speaking to a DSL if they still have concerns after a failed or limited disclosure. The DSL member will venture to determine how to best build a trusting relationship and facilitate further communication with a trusted adult.

### **7.3 If you discover that FGM/Forced Marriage has taken place or a pupil is at risk of FGM/Forced Marriage**

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

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

Forcing a person into a marriage is a crime in England and Wales. In the rare case that a member of staff has concerns about this should alert the DSL who will follow statutory guidance "The right to choose: Government guidance on forced marriage and or will contact the Forced Marriage Unit at [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk). Please see appendix 2 for further information

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

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

Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **Early help**

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

professionals in an early help assessment, in some cases acting as the lead practitioner. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. The school will act as lead organisation where it feels this is appropriate to do so. The half termly Local area network meeting held at the school will be attended by the DSL or a deputy where all Early Help referrals (with parent's consent) can be discussed further with multiple agencies including our feeder primary schools.

The following link is for the Herefordshire council support EHA page and should be used to ensure up to date templates and resources are used

[https://www.herefordshire.gov.uk/info/200227/support\\_for\\_schools\\_and\\_settings/615/behaviour\\_and\\_support/2](https://www.herefordshire.gov.uk/info/200227/support_for_schools_and_settings/615/behaviour_and_support/2)

Herefordshire currently offers all stakeholders a support and advice service CHAT contact details tel 01432 260261 where possible referrals to Early Help service can be discussed without referral. The new MAG system also allows the DSL team to raise a case of a particular student with or without a formal EHA or EHA referral for discussion with health, police and children's services personnel as long as there is parental/guardianship advice to do so

Students themselves can seek advice and self help strategies through the Herefordshire Safeguarding boards youth portal/hub [www.herefordshiresafeguardingboards.org.uk/youth\\_hub](http://www.herefordshiresafeguardingboards.org.uk/youth_hub)

Similarly where there are concerns about a student with significant periods of school absence that may or may not raise safeguarding concerns- students can be discussed and reviewed at regular Children Missing In Education meetings as well as the schools EWO Jo Ellis [jo.ellis@jmhs.hereford.sch.uk](mailto:jo.ellis@jmhs.hereford.sch.uk)

## **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. Staff can seek guidance and support before completing a MARF form, from the Herefordshire MASH education team or The Early Help Hub Hereford. Staff can also access the Herefordshire Directory of Early Help Services for details of local organizations for whom the school may consider a direct referral for a range of needs.

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

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

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

In terms of referring to the police the document below is a useful guide as when and when not to contact the police on a range of issues. Staff if in any doubt that a child is open to imminent and significant harm should not hesitate in contacting 999. After consultation with Safeguarding trained staff or Senior leadership a 111 referral (or similar online referral) can be made to West Mercia police. Alternatively where the school has soft and or unsubstantiated claims and evidence that may indicate a child is involved in criminal activity as perpetrator or victim, West Mercia Police can be contacted through [joane.utley@westmercia.pnn.police.org](mailto:joane.utley@westmercia.pnn.police.org) or evidence can be logged on [ceherefordshire@westmercia.pnn.police.uk](mailto:ceherefordshire@westmercia.pnn.police.uk)

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

## **7.5 If you have concerns about extremism**

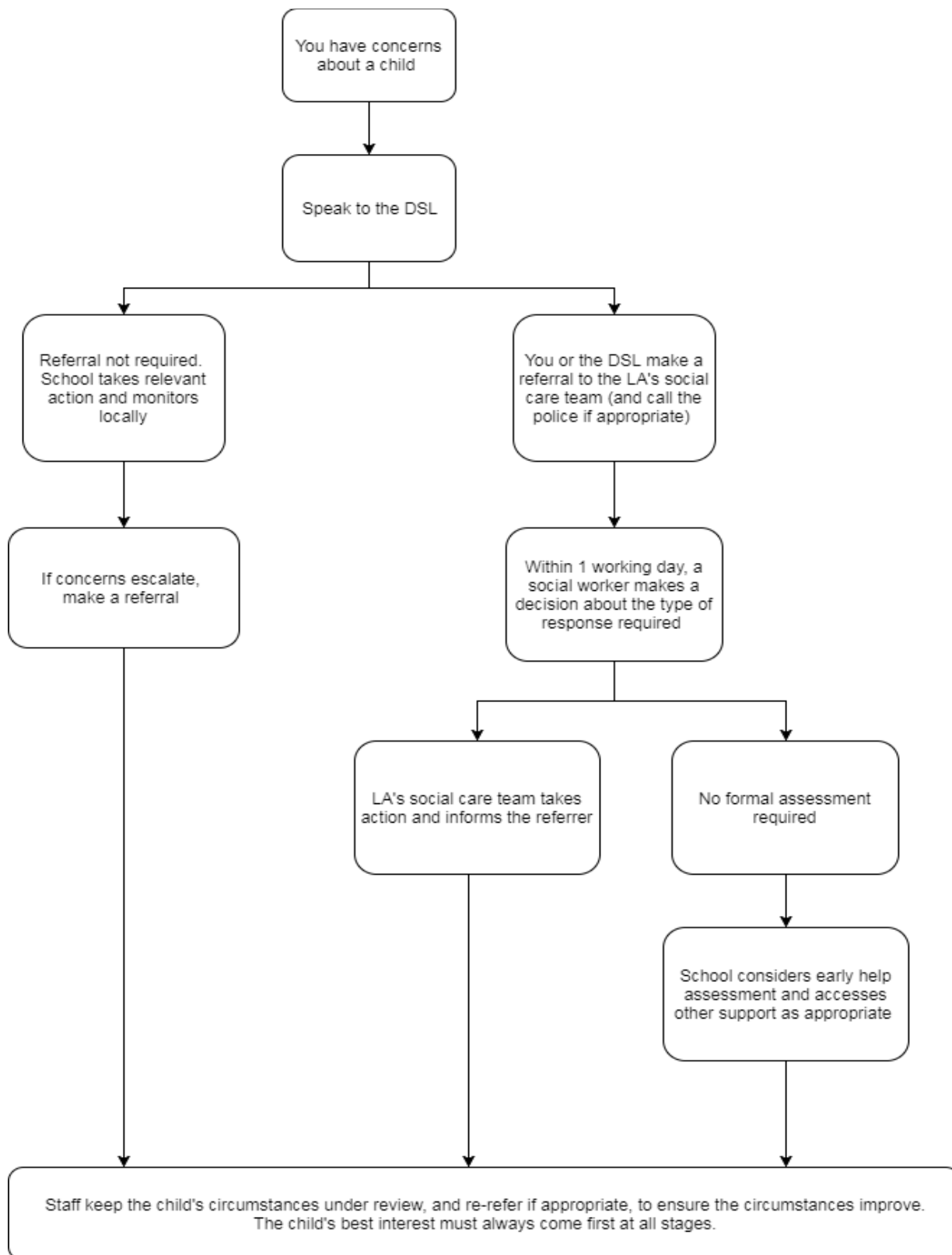
If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If, in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

**Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note –if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)





## 7.6 Concerns about a staff member, contractor or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

Low Level concerns whereby a staff member does not believe actual or imminent harm has or is about to occur, however behaviours do cause concern in that they appear to be contrary to the school code of conduct or seem inappropriate in terms of values and attitudes, must also be communicated ( see appendix 3) Concerns about professional capacity or teaching quality should not be referred to as or responded to as low level safeguarding concerns.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate. Ultimately all concerns about and allegations about staff behaviour will be forwarded to the Herefordshire LADO who is available on 01432 260800 and/or [LADO@herefordshire.gov.uk](mailto:LADO@herefordshire.gov.uk). Currently the Herefordshire LADO is Mr Terry Pilliner.

Any staff member concerned about a colleague and the risks they may or may not present should seek initial guidance in the schools whistleblowing policy but should not hesitate in making their concern known to the headteacher.

Staff must be fully aware that if they believe any of the 4 “harm thresholds” have been met then they DO NOT have a low level concern and should escalate with the headteacher and DSL accordingly so the LADO can be consulted. Harm thresholds may be met by a staff member outside of the school environment or within their own domestic setting but should still be responded to similarly

- **THRESHOLD 1: Harm threshold:** a person working with children has behaved in a way that has harmed a child, or may have harmed a child
- **THRESHOLD 2: Criminal threshold:** a person working with children has possibly committed a criminal offence against or related to a child
- **THRESHOLD 3: Risk/Transferable Risk threshold:** a person working with children has behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- **THRESHOLD 4: Suitability threshold:** a person working with children has behaved or may have behaved in a way that indicates they may not be suitable to work with children

## 7.7 Child on Child Abuse

- We all understand that the definition of child on child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children and within children’s relationships (intimate and non-intimate)
- We all understand that Child on child abuse requires a contextual safeguarding approach in which professionals understand the potential harms that students may experience outside of the school environment and that we consider fully the safety of our students in their own neighbourhoods, transport systems, central areas, social gatherings and online/ within online communities. Although we are in a lesser position to respond to such harms we must appreciate their potential ramifications back in school and ensure that information is shared with those in a better position to act
- We all understand that child on child abuse takes on many forms including serious bullying, cyber-bullying, relationship abuse, domestic violence, child sexual exploitation, youth violence, prejudice-based violence and harmful sexual behaviours
- We all recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We also recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys’ perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously. There is in effect a zero-tolerance approach to ignoring such incidents

- We all understand that just because we may not be aware of multiple and serious cases of Child on child abuse in our school community that they do not or have not indeed taken place and therefore it is not acceptable to take on only a reactive response. We understand that in our own and national context data shows that it is the most prevalent form of safeguarding concern
- We all recognise the need not to define incidents in terms of VICTIM and or PERPETRATOR when alleged incidents have been reported or under investigation. Research has shown that those who present harmful behaviour are themselves vulnerable or have experienced similar or differing levels of abuse
- We all recognise that JMHS is an 11-18 school and that although the schools starting point is that responses to child on child abuse should be the same, there may be age-based considerations. For example, based on the legal age of consent and or the legal repercussions for those students aged over 18. We recognise a 2 school cohort year gap between perpetrator and victim as particularly significant
- We all accept and are mindful of the fact that there are groups within the school that will be more vulnerable to such abuse including those with a Special Educational Need or Disability, Looked after children as well as accepting that statistically girls are more likely to experience harmful sexual behaviours than boys. We also recognise the potential of increased vulnerability of students from the LGBTQ+ community
- We all understand that harmful behaviours exist on a continuum or spectrum in terms of severity. The pastoral team use Hacketts continuum of harmful sexual behaviours (although the DSL, due to accreditation, will also consider Brooks Traffic Light tool in serious cases) which categorises behaviours as normal, inappropriate, problematic, abusive or violent

| Normal   | Inappropriate  | Problematic  | Abusive   | Violent  |
|--|--|--|---|--|
| Behaviour is developmentally expected<br>Socially acceptable<br>Consensual, mutual and reciprocal<br>Involves shared decision making | Single instances of inappropriate sexual behaviour<br>Socially acceptable within the peer group<br>Behaviour is in an inappropriate context<br>Generally consensual and reciprocal | Behaviour is problematic and concerning<br>Developmentally unusual or socially unexpected<br>Consent issues unclear<br>May lack reciprocity or equal power<br>May include compulsivity | Victimising intent or outcome<br>Misuse of power<br>Involve coercion or force<br>Intrusive<br>Lack informed consent or victim unable to give consent<br>May include expressive violence | Physically violent<br>Highly intrusive<br>Instrumental violence, physiologically or sexually arousing to the perpetrator<br>Sadism |

Although Hacketts relates exclusively to harmful sexualised behaviours it does form a basis for wider decision making in terms of:

Is the behaviour socially acceptable?

Is it a single event or has it occurred over a period of time?

Is it considered socially acceptable by peer group?

Is it problematic or concerning?

Does it involve overt elements of victimisation or discrimination?

Does it involve elements of coercion and or pre-planning?

Does it involve a power imbalance or misuse of power?

## 7.8 Responding to child on child abuse allegations and incidents

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a safety plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This may require adjustments made to student timetables in both the short and long term
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL will make a decision on, if, when and how parents and carers will be informed. Parents will be informed at the earliest stage possible unless there is a compounding safeguarding reason to not do so
- The DSL will signpost, refer and or discuss with students and their families a range of other organizations for whom it may be appropriate for students to work with, for example those support agencies listed on the Herefordshire directory for early help e.g WRMSAC/Purple leaf project

**We will minimize the risk of child on child abuse by:**

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent including the mandatory delivery of the RSE curriculum and the concept of online safety
- Ensuring pupils know they can talk to staff confidentially by contacting staff via email, seeing any member of staff in person or coming with an advocate. Ensuring that young people are never made to feel judged or that they are creating a problem
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Being vigilant with or mobile phone and other online policies
- Regularly seeking the view of students and parents on the topic of child on child abuse
- Reflecting on serious case reviews both within and outside of the school

## **7.9 Sexting “Youth produced sexual imagery” or “sharing nudes”**

This advice uses the titled terms to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 via social media, gaming platforms, chat apps or off line services such as Apple Air drop

The motivations for taking and sharing such material is not always sexually or criminally motivated and can be created and shared consensually. There can also be levels of coercion even in a consensual relationship. Children can find nude images on line and pass them off or manipulate them so they can appear as an abuse.

Incidents should be defined and approached as either:

### **Aggravated (additional abusive elements)**

- Adult involved
- Youth only (intent to harm) arising from interpersonal conflict
- Youth only (reckless) images sent without consent – but with no intent to harm

### **Consensual experimental (no intent to harm)**

- Either romantically or sexual attention seeking or other

Creating and sharing nudes of under 18year olds is a criminal offence and makes responding to such incidents complex.

Indecent is not defined in legislation but it does not necessarily mean nudity. Images of young people in underwear, part exposing themselves, touching themselves sexually, hurting others sexually and any sexual activity including children or animals are all defined as indecent.

### **Your responsibilities when responding to an incident**

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

You must **not**:

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

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

### **Initial review meeting**

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

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

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

#### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review. They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

#### **Informing parents**

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

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through either initial enquiries with the 101 service. Where staff are concerned that a serious criminal event is imminent or has happened which puts a student at risk of physical abuse they should use the 999 service. The DSL will work with the police to mitigate the unnecessary criminalisation of young people and where appropriate finding a resolution "Outcome 21" where there is no evidence of exploitation, grooming, profit or malicious/persistent behaviour. Where the police attend school to interview a young person in relation to a safeguarding concern and or criminal matter the school will ensure the presence of an appropriate adult to both support the student and observe proceedings in line with PACE Code C guidance. The appropriate adult will be a member of the safeguarding team and where possible a choice of adult will be offered. Where appropriate and possible we will try to ensure that the student has the opportunity to have a parent or guardian present as the appropriate adult.

#### **Recording incidents**

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

#### **Curriculum coverage**

As part of the school's RSE provision and general PSHE programme, a range of safeguarding issues are discussed and keep safe strategies explored. As this policy is being written the full RSE and PSHE curriculum and model is under review including how the school can increase specialist provision of issues including County Lines, Child Sexual Exploitation, Harmful sexual behaviours, Consent, Extremism and racism, Knife and other crimes, Peer on Peer abuse, Online safety, Sexting, Mental Health. Currently the curriculum is developed by Mr A. Bees (safeguarding trained) and is reviewed by the whole safeguarding team. On all issues, pupils are taught in an environment where there are clear guidelines about disclosure and confidentiality. The school will where it feels necessary alert parents and carers to subject matter which they may feel inappropriate. The overall content is outlined to parents as part of the induction process and available on school website.

With all topics and issues the teacher covers the following in relation to them:

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

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide images and or behave in an unsafe way

Policies on safeguarding are also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **8. Notifying parents**

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

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

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

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

## **9. Pupils with special educational needs, disabilities and other potential vulnerabilities**

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

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

Although we recognise that being LGBT does not lead to inherent vulnerability, young people with these protected characteristics can be targeted by other students and the school will actively seek to foster a trusted and safe support group or individual for these students and create safe spaces for them to

discuss their experiences. Any student perceived as being LGBT but is not necessarily will also be supported individually where appropriate by key members of the pastoral team.

## **10. Mobile phones and cameras**

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

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

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

The JMHS Policy around mobile phones is that they are not permitted to be used on school site or at any school off site trip unless there is express permission from the supervising member of staff. Students who break this rule will have their phone confiscated and parents/carers will be informed for collection. The school recognises the risk of unrestricted access to the internet in terms of exposure to possible harmful material, sexual abuse or harassment, the sharing of indecent images, fake news, viral challenges and other risks which are discussed within the school assembly and RSE programme.

Staff should be aware that full details about mobile phones and other devices is available in the Online safety policy and Acceptable use of ICT policy

## **11. Complaints and concerns about school safeguarding policies**

### **11.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff using the [Disciplinary Policy and Procedures](#)

### **11.2 Other complaints**

[Concerns and Complaints Policy](#)

### **11.3 Whistle-blowing**

[Whistleblowing Policy and Procedures](#)

The NSPCC also run a free Whistleblowing advice phonenumber which staff should be aware of and may wish to use in conjunction with processes outlined in whistleblowing policy

"The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organization".

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

## **12. Record-keeping**

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Unless instructed otherwise, all information and narrative regarding safeguarding concerns will be stored on the My Concern platform either as a New concern, Open to intervention and further investigation, filed or archived.

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file (within a 5 day window of admission wherever possible) with a confirm receipt of arrival. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. If the school is also on the “MyConcern system” then documentation will be shared using the secure file transfer feature. Otherwise the folders will be passed on using secure email systems such as “Anycomms” or in person with a signed receipt of collection form collected. All information received from primary feeder schools is logged on MyConcern on its receipt by our Admissions coordinator who then alerts the DSL and team.

It is important that for **all students**, key information is recorded such as behavioural interventions and sanctions, incidents of unauthorised/authorised non-attendance, plus at least 2 emergency contact details.

In addition:

- Appendix 2 Safer Recruitment Policy sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- The Disciplinary Policy and Procedure sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 13. Training

### 13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. Training will include updates on the local safeguarding context but also national and topical issues

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

Staff will be regularly updated and have training refreshed on the systems nationally and locally for Early Help and other Children’s services applications and assessments and their potential role in them.

Staff will also be trained in terms of their role and responsibility when it comes to managing and providing guidance in terms of online safeguarding.

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

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

Volunteers will receive appropriate training, if applicable.



### **13.2 The DSL and deputies**

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training

Various training opportunities are available across the year ranging from whole school briefings on trauma, Child on Child abuse, Safer Recruitments and identification/response to safeguarding incidents. There also exists opportunities for some staff to access Herefordshire CPD courses on the Early Help process, CSE assessment, completing graded care profiles and Prevent agenda. There are also opportunities for Safeguarding team members to attend Team Teach “Safer Handling” courses

Safeguarding team members are requested to update their safeguarding training credentials at a biannual training “summit” and the DSL and key staff also are encouraged to attend the county wide safeguarding conference held each year in November and the termly Herefordshire partnership education sub group meetings

### **13.3 Governors**

All governors receive appropriate training about safeguarding both on induction and annually, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. They sign a safeguarding understanding document to acknowledge their training. Training focuses on strategic roles and functions rather than procedures. Both training and Governor updates should allow the Governing body to support a robust whole school approach to safeguarding which will be a consideration and responsibility of all governing committees.

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

### **13.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures, and the School Safer Recruitment Policy (Appendix 2). The school exercises the right to undertake social media and online screening of candidates once shortlisted and before attending interview

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

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

## **14. Safeguarding arrangements in the light of significant extended home and online learning**

Details of online learning protocols can now be found in the Online Safety policy

## **15. Monitoring arrangements**

This policy will be reviewed **annually** by the DSL, Deputy DSL, Deputy Headteacher and the Link Governor for Safeguarding & Child Protection,. At every review, it will be approved by the full governing board.

## 16. Links with other policies

This policy links to the following policies and procedures:

- > [Behaviour](#)
- > [Code of conduct](#)
- > [Disciplinary policy and procedure](#)
- > [Concerns and complaints policy](#)
- > [Safer recruitment policy](#)
- > [Whistleblowing policy and procedure](#)
- > [Acceptable use of ICT and internet facilities policy](#)
- > [Health and safety policy](#)
- > [Attendance policy](#)
- > [Equalities policy](#)
- > [Relationships and sex education policy](#)
- > [First Aid policy](#)
- > Online safety policy

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

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

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

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

**DOMESTIC ABUSE** - Page 144 of KCSIE gives a statutory definition of Domestic abuse/violence and recognizes it as a significant harm in its own right when young people can be directly harmed but also a harm for any young person who witnesses and experiences it within their household. As an under 16 year old you cannot legally experience DA directly and such events and risks should be referred to as "teenage relationship abuse". On page 145 of KCSIE a number of support agencies are signposted including the National Domestic Abuse line 0808 2000. DSL staff will ensure that information received from operation encompass treated to DV are recorded and acted upon accordingly. Where we feel communication with adults within a family home will create increased risk of domestic violence we communicate directly with Police and MASH teams.

**HOMELESSNESS** - Page 146 outlines key legislation and responsibilities related to young people and their families in terms of being homeless including a link to statutory guidance. For young people who find themselves unable or excluded from living in the family home. Local authority children's social care must lead on an intervention strategy with DSL making the correct referrals where required. DSL's should seek to ascertain whether a young person has voluntarily withdrawn themselves from the family home or not also If a young person lives with someone who is not a family member for a significant period if they have met the threshold for "private fostering" status.

### **CRIMINAL CHILD EXPLOITATION (COUNTY LINES)**

Defined by the government as "organised criminal networks that export illegal drugs into import areas within the UK using dedicated mobile phones or other "deal line" methods. They will often exploit children to move and store both drugs and money using coercion, intimidation violence including sexual violence and weapons. Where there are concerns raised in school that could point to such activity including periods of time outside local area and or sudden increases in material wealth/phone possession then the school would make referral to MASH and or police. The school will undertake where appropriate Herefordshire CE screening tools regarding young people and any exploitation concerns

### **Appendix 2: safer recruitment DBS checks, and information sharing – policy and procedures**

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

#### **New staff**

When appointing new staff, we will follow our [Safer recruitment policy](#) and

- Verify their identity
- We will undertake for all newly appointed staff an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below), unless they subscribe to the Update Service in which case we will check this on-line. We will ensure we see the original DBS certificate for all staff and we will not keep a copy of this for longer than 6 months on file. With regards to PGCE students, it is the responsibility of the PGCE provider to provide checks – a letter of confirmation of DBS number is provided for each student and proof of id is obtained on starting, which is recorded on the Single Central Record.

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and in line with our records retention schedule
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Seek and view references from previous employers before interview so as interview questions can reflect circumstances and key events that may need unpacking
- Search online presence via a google search for a shortlisted candidate plus notify candidates that this check is forthcoming
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state. Section 128 will only be requested/ undertaken where candidate has senior management responsibilities or is a board member

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

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

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

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

### **Existing staff**

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

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

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made. This applies also to education provider placements where the school may choose to place a student as part of their curriculum. Where an agency worker does have a disclosure on DBS the school will obtain the certificate.

### **Contractors**

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

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

### **Users of School premises /JM Sport**

Where an organisation external to the school is using the school premises for a non-school or college activity involving children, the Governing Body and Leadership team should, seeking guidance if necessary, ensure that appropriate safeguarding and child protection policies are in place.

### **Trainee/student teachers**

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

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

### **Volunteers**

We will:

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

## **Governors**

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

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

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

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. It is the schools' responsibility to make any alternative provider fully aware of any key or specific needs, plus contextual information that may make a student particularly vulnerable and complete a specific risk assessment where appropriate. The school should always be satisfied that the alternative provision does meet the needs of the student undertaking a visit if possible and necessary.

## **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Pupils staying with host families**

Where the school make arrangements in the UK for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit to JMHS), we will request enhanced DBS checks with barred list information on those people.

Where the school or host schools are organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **Elective Home education**

Where a parent or guardian has elected to home educate (as is their right), the school will always be mindful to that young person being less visible to public and children's services and therefore more vulnerable to a range of harms. Wherever possible a meeting with relevant agencies involved would be held to explore any decision to home educate and relevant authorities notified.

## Appendix 3: allegations made against staff

Where it is alleged that a current member of staff or volunteer has:

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

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

Our procedures for dealing with allegations will be applied with common sense and judgement using the [Disciplinary policy and procedure](#) see page 5 of that Policy.

### Suspension

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

### Procedure for dealing with allegations

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

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details



- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

## **Specific actions**

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

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

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

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

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

### **Unsubstantiated or malicious allegations**

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

### **Confidentiality**

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

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

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

### **Record-keeping**

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

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

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

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

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

### **References**

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

### **Learning lessons**

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

This will include consideration of (as applicable):

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

### **Low level Concerns**

Staff may not consider a colleagues' actions or behaviour to meet the 3 thresholds stated at the beginning of appendix 3 however they may still be concerning and indeed part of a bigger picture in terms of that individual staff member. It is the responsibility of all staff to communicate their concerns where they feel that behaviours witnessed do not meet the requirements of the school code of conduct or indeed are perceived as unprofessional. Concerns may include staff humiliating or favouring students, using mobile phones with students, spending significant time one to one with a student, being over familiar with young people or using inappropriate language. Staff should take care that they report such concerns to the headteacher either directly or via the School Human Resources Manager but should direct concerns not linked to safeguarding, for example professional differences or teaching competency concerns through their line manager.

Low level concerns will be logged separately to staff files and staff will be informed of the logging and the duration of the record being stored whilst remaining an employee of the school. Only the headteacher who may choose to work with the Safeguarding lead or other key senior staff can make the decision to escalate the concern and notify the LADO or else respond to the concerns internally.

## Appendix 4: Specific Safeguarding Issues

### Children missing from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. The school will notify the authority after 5 days where there has been no notification/attendance from a student. Where there is an enhanced concern due to the vulnerability of a particular student then the school will alert local police and ask them to undertake a "safe and well" visit. If the school after 20 days wishes to remove a student from its school role it will alert the local authority. The school will use an independent EWO to review all decisions relating to CME where possible. In line with our attendance policy all students missing from school where this has not been notified through all possible channels, will be contacted through the student services office.

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

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

### Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

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

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

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. Staff may at this point be asked to complete a Herefordshire CSE assessment with support from the DSL.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

### **Homelessness**

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

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

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

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

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

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

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

### **FGM**

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

➤ A girl:

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

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

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

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

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

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

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

The DSL will:

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

### **Preventing radicalisation**

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

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

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

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

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

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

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

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

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

### **Looked After Children**

If the student is a Children who are looked after (CLA), all staff closely involved with him/her should know this, as it may affect practical matters such as who meets the child from school, permission to go on outings, parents' evenings, etc. There is a need for sensitivity and discretion in handling such matters. Looked after children are potentially especially vulnerable and therefore it is essential that relevant staff are aware of their needs and specific barriers so that excellent support is provided to the child or young person. The Designated Looked After Child (DLAC) member of staff has responsibility for liaising with relevant agencies for CLA students. The DLAC should liaise closely with the Herefordshire Virtual School and play an integral part in the CLA review process and PEP (EPEP) process. Private Fostering is defined as an arrangement made without the input of children's services for any under 16 year old (18 if disabled) which is intended or does last more than 28 days and involves someone not in the close family taking on parenting role. Although such arrangements can be a positive response these students are potentially vulnerable. The school must notify the LA where we believe that such an arrangement is taking place and that the authorities have not been notified.

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

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign using the Sign In electronic system and wear a visitor's badge.

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

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

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

Visitors will be directed to printed information on arrival about the Safeguarding protocols and team in the school.

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

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

Remain with that student or ensure suitable supervision is in place whilst we use Bromcom contacts to ascertain reasons and responses for non-collection. Duty Staff or DSL staff will take the lead on any such supervision, or in the case of the return from a school trip/event after hours, the trip leader will take responsibility notifying the DSL if and when appropriate.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

1. Conduct a thorough search of the school site (duty staff) of legitimate and illegitimate locations, plus, the immediate vicinity of school environment
2. Where appropriate speak to other students about possible knowledge of whereabouts



3. Notify parents and carers of missing student within 10 minutes of subsequent failure of student to be found
4. Agree with parent /carer if available on the need to contact the police and at what point

Where the school cannot account for a students' whereabouts and parent or carer cannot be contacted it will not hesitate to report this to the police using 101 or where there is significant concern that the student is at risk of imminent and significant harm 999

## Appendix 5 Monitoring and Review

### DAILY

Inbox My Concern review DSL and SUPPORT  
 Safety Plan arrangements YEAR LEADERS

### WEEKLY

Staff updates safeguarding briefing DSL /ONLINE LEAD/MENTAL HEALTH LEAD  
 Open Concerns update DSL with YEAR LEADERS  
 Year leader update on PT timetables/ alternate provision/safety plans DSL with YEAR LEADERS

Behaviour data review BEHAVIOUR LEAD /YEAR LEADERS

### FORTNIGHTLY

Persistent Absentee review ATTENDANCE LEAD EWO YEAR LEADERS SUPPORT  
 Year leader DSL meeting DSL AND YEAR LEADERS  
 PSP reviews YEAR LEADERS

### HALF TERMLY

Link Governor DSL meeting/supervision DSL  
 Safeguarding SRE workshops with Year leaders LEAD TEACHER PSHE AND YEAR LEADERS  
 Assembly coverage of safeguarding review and planning YEAR LEADERS ENRICHMENT COORDINATOR  
 Medical Care Plan reviews LEAD FIRST AIDER AND SENDCO  
 Student and Significant incident update with Headteacher DSL and HEADTEACHER  
 Data dashboard update DSL SUPPORT YEAR LEADERS  
 Low level Concerns Headteacher DSL feedback DSL HEADTEACHER  
 EHA reviews YEAR LEADERS  
 Herefordshire MAG review DSL

### TERMLY

Safeguarding awareness quiz DSL  
 Student PEP and LAC reviews DLAC  
 Single Central register check HUMAN RESOURCES DSL EXTERNAL AGENCY  
 Full Safeguarding team meeting DSL YEAR LEADER MENTAL HEALTH ONLINE SRE DLAC  
 Safeguarding Personnel and Welfare Governors meeting agenda item DSL  
 Safeguarding Improvement plan review DSL

### Bi ANNUALLY

External Supervision meeting DSL EXTERNAL AGENCY  
 Online safety review DSL ONLINE LEAD  
 Mental Health review DSL MENTAL HEALTH LEAD  
 Student teacher safeguarding induction session DSL

Feeling Safe student voice surveys DSL YEAR LEADERS  
Mental Health student voice exercise MENTAL HEALTH LEAD YEAR LEADERS

**ANNUALLY**

Child protection including child on child abuse policy DSL  
Induction training session DSL  
Governor training session DSL  
New teacher induction enhanced safeguarding training DSL  
New teacher Online safeguarding induction training LEAD TEACHER OL SAFETY  
New teacher Mental Health induction training LEAD TEACHER MH  
MC policy sign off DSL SUPPORT  
Safeguarding self-certification DSL SCHOOL MANAGER  
Full safeguarding report to Governors DSL  
Equalities policy review DSL  
Attendance policy review LEAD TEACHER ATTENDANCE  
KS4- KS5 Safeguarding briefing with JMHS YEAR LEADER 11 AND SIXTH FORM  
KS2- KS3 safeguarding transfer DSL YEAR 7 LEAD SUPPORT  
Safeguarding Herefordshire Children's Service audit DSL  
Safeguarding Improvement plan within SDP target set and review DSL  
360 online safety review

**MORE THAN ANNUAL**

Safer handling training EXTERNAL AGENCY  
Full safeguarding training for DSL or update DSL  
Safer recruitment training update DSL HUMAN RESOURCES MANAGER  
Equalities Objectives review DSL

## APPENDIX 6 Policy sign off, induction protocols & training requirements (DRAFT APPENDIX WORK ON-GOING)

| <b>Policy Suites</b>  |
|---|
| <b>Suite A (pre-start date)</b>   |
| Code of conduct<br>Child protection and SG policy<br>Herefordshire right help, right time document<br>Keeping children safe in education Part 1   |
| <b>Suite B (induction)</b>  |
| Anti-bullying policy<br>Fire procedures<br><br>Data protection policy<br>What to do if you think a child is being abused<br>Working together to safeguard children<br>Equalities policy<br>Behaviour policy<br>Prevent sign off<br>Health and safety policy<br>Life at JMHS<br>First aid policy<br>Online Safety policy   |
| <b>Suite C (in first 6 weeks of appointment)</b>  |
| Social media policy<br>Whistleblowing policy<br>GDPR awareness sign-off   |
| <b>Suite D (extended safeguarding policies and procedures)</b>  |
| Keeping Children Safe in Education parts (all sections)<br>Gov guidance on search and confiscation<br>Govt guidance on exclusion from maintained schools and academies<br>UKCCIS guidance on Sexting in school<br>Govt guidance on sexual violence and harassment between children in schools<br>Govt guidance on the use of reasonable force in schools<br>Information sharing gov advice for safeguarding practitioners<br>Guidance for safer working practices in school<br>DfE drug advice for schools<br>Cyber bullying; advice for headteachers and school staff<br>DfE Children Missing in education statutory guidance<br>JMHS Safer recruitment policy |
| <b>Suite E (for JMSport staff)</b>  |
| Trampolining policy<br>Squash court risk assessment<br>Table tennis risk assessment<br>Badminton risk assessment<br>Lone worker guidance - sports centre  |

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|  | <b>MyConcern status</b> | <b>DBS status</b>         | <b>On SCR</b> | <b>Safeguarding training/information</b>            | <b>Policy suite sign-off</b> | <b>SG quiz requirement</b> | <b>Colour of lanyard</b> | <b>Visitors' id required</b> | <b>student plan re vulnerable students and list</b> |
|--|-------------------------|---------------------------|---------------|---|------------------------------|----------------------------|--------------------------|------------------------------|---|
| <b>Personnel on site</b>   |                         |                           |               |   |                              |                            |                          |                              |   |
| <b>Teaching staff</b>  | Trusted user            | Enhanced with barred list | Yes           | In-house SG training                                | A, B, C                      | Yes                        | Blue                     | No                           | Yes   |
| <b>Designated safeguarding leads</b>   | DSL                     | Enhanced with barred list | Yes           | In-house SG training<br>DSL training                | A,B,C,D                      | Yes                        | Blue                     | No                           | Yes   |
| <b>Senior Leadership team</b>  | Trusted user            | Enhanced with barred list | Yes           | In house SG training/<br>safer recruitment changing | A, B,C,D                     | Yes                        | Blue                     | No                           | Yes   |
| <b>Extended Senior leadership team</b>   | Trusted user            | enhanced with barred list | Yes           | In house SG training                                | A,B,C                        | Yes                        | Blue                     | NO                           | Yes   |
| <b>Teaching assistants (including assistant SENDCO)</b>  | Trusted user            | Enhanced with barred list | Yes           | In-house SG training                                | A, B, C                      | Yes                        | Blue                     | No                           | Yes   |
| <b>Support staff (student facing) eg site staff; student services; VI form admin; librarian; exams officer; IT staff; lab/DT/PA techs; receptionists; Head's PA; SBM; careers adviser)</b> | Trusted user            | Enhanced with barred list | Yes           | In-house SG training                                | A, B, C                      | Yes                        | Blue                     | No                           | No  |

|   |              |                           |     |   |         |             |                 |     |     |
|---|--------------|---------------------------|-----|---|---------|-------------|-----------------|-----|-----|
| <b>Support staff (back office)<br/>eg finance team;<br/>data manager; HR<br/>manager)</b> | Basic user   | Enhanced with barred list | Yes | In-house SG training  | A, B, C | Yes         | Blue            | No  | No  |
| <b>Supply staff</b>   | non status   | Enhanced with barred list | Yes | pamphlet/ sign off sheet<br>main agencies provide safeguarding letter | N/A     | NO          | Green           | Yes | No  |
| <b>JMSport staff</b>  | non status   | Enhanced with barred list | Yes | Sign off sheet  | N/A     | Quiz 1 only | Blue            | No  | No  |
| <b>Invigilators</b>   | non status   | Enhanced with barred list | Yes | In house safeguarding induction and sign off sheet                    | A,B     | NO          | Blue            | No  | No  |
| <b>Catch-up tutors</b>  | Basic user   | Enhanced with barred list | Yes | In house safeguarding training and induction sign off sheet           | A,B     | Quiz 1 only | Blue            | No  | Yes |
| <b>Peripatetic tutors</b>   | non status   | Enhanced with barred list | Yes | In house safeguarding training and induction sign off sheet           | N/A     | Quiz 1 only | Green           | Yes | YES |
| <b>Governors</b>  | N/A          | Enhanced with barred list | Yes | In-house SG training plus induction sheet                             | A       | Quiz 1 only | Blue            | No  | No  |
| <b>ITT students</b>   | Trusted user | Enhanced with barred list | Yes | In house SG training  | A B     | Quiz 1 only | Blue            | No  | Yes |
| <b>VI Form learning support assistants</b>  | N/A          | Enhanced with barred list | Yes | In house training   | N/A     | No          | VI form lanyard | No  | No  |

|   |              |                           |     |  |       |    |                    |     |    |
|---|--------------|---------------------------|-----|--|-------|----|--------------------|-----|----|
| <b>Cleaning contractors</b>                   | N/A          | Enhanced with barred list | Yes | SG induction for contractors sign-off  | N/A   | No | Green              | Yes | No |
| <b>Catering contractors</b>                   | non status   | Enhanced with barred list | Yes | SG induction for contractors sign-off  | N/A   | NO | Green              | Yes | No |
| <b>Grounds maintenance contractors</b>        | non status   | Enhanced with barred list | Yes | Visitors' leaflet  | N/A   | No | Contractors' badge | Yes | No |
| <b>Volunteers</b>                             | non status   | N/A                       | No  | Visitors' leaflet<br>Regular volunteers will follow as per ITT/catch-up tutors | N/A   | No | Red                | Yes | No |
| <b>Visiting speakers</b>                      | non status   | N/A                       | No  | Visitors' leaflet  | N/A   | No | Red                | Yes | no |
| <b>IAG adviser</b>                            | basic user   | Enhanced with barred list | Yes | induction training sign off sheet  | A,B   | No | Green              | Yes | No |
| <b>Educational welfare officer</b>            | Trusted user | Enhanced with barred list | Yes | induction training sign off sheet  | A,B   | No | Green              | Yes | no |
| <b>Counselling/healthcare staff (regular)</b> | non status   | Enhanced with barred list | Yes | induction training sign off sheet  | N / A | No | Green              | Yes | No |
| <b>Approved visitors</b>                      | N/A          | Enhanced with barred list | No  | Visitors' leaflet  | N/A   | No | Green              | Yes | No |
| <b>General visitors</b>                       | N/A          | N/A                       | No  | Visitors' leaflet  | N/A   | No | Red                | Yes | No |