



BANTOCK PRIMARY SCHOOL

Safeguarding & Child Protection Policy

Headteacher	H Sarai
Chair of Governors	N Round
Approved Date	5.2.15/10.3.16/2.2.17/1.2.18/31.1.19/24.6.20/31.3.21/13.10.21 28.9.22/27.9.23/2.10.24/ 8.10.25

School Contacts	
Role	Name
Designated Safeguarding Leads	Mr J Thomas (Headteacher)
Deputy Designated Safeguarding Leads	Mrs R McEntee (English Lead) Mr D Fullard (Technology Lead) Miss N Gulasova (Pupil & Family Support)
Chair of Governors	Mrs Nicola Round
Nominated Governor for Safeguarding	Mrs Nicola Round
Single Point of Contact (SPOC)	Mr J Thomas (Headteacher)
Online Safety Lead	Mr D Fullard (Technology Lead)
Mental Health Lead	Mr L Craze
Operation Encompass Key Adult	Mr J Thomas (Headteacher)
Prevent Lead	Mr J Thomas (Headteacher)
SENCo	Mrs Pickford
Data Protection Officer	Mrs A Sohi (School Business Manager)
Designated Member of Staff for eSafety	Mr D Fullard (Technology Lead)
Designated Teacher for Children & Young People in Care and Previously in Care	Mr J Thomas (Headteacher)

External Contacts	
Agency	Contact Details
LA Interim Head of Service	Andrew Wolverson 01902 550477 Andrew.wolverson@wolverhampton.gov.uk
LA Deputy Head of Safeguarding Service	Nicki Pettitt
Local Authority Designated Officers (LADO)	Kelly Matthews 01902 550477 LADO@secure.wolverhampton.gov.uk LADO@wolverhampton.gov.uk (non-secure email)
LA Attendance Manager	Sarah Flanagan Sarah.flanagan@wolverhampton.gov.uk
LA Attendance Advisor	Michelle Cook 01902 550621 / 07771836782 Michelle.cook@wolverhampton.gov.uk
Children in Need and Child Protection Services	Mr Julian Cunningham Priory Green Building Whitburn Close Pendeford Wolverhampton WV9 5NJ. Tel: 01902 553039 Fax: 01902 553048 Website: www.wolvesscb.org.uk Email: wscb@wolverhampton.gov.uk
MASH (Multi-Agency Safeguarding Hub)	01902 555392 (Out of hours 01902 552999)
West Midlands Police Intelligence Form for Partners (see appendix R)	101 ext 822 5801 (Mon - Sun 7am - 10pm) Emergency 999 fib@west-midlands.pnn.police.uk WV_Partnerships@west-midlands.pnn.police.uk
West Midlands Police	Seargent Stephanie Reynolds stephanie.reynolds@westmidlands.police.uk Nicky Summers Police and School Panel Manager Partnerships Team 101 ext 872 3006 / 07749 015416

	Nicola.summers@westmidlands.police.uk PCSO 31531 Emma Dimmock Early Help Officer 101 ext 871 3199 / 07391019362 Emma.dimmock@westmidlands.police.uk
Education Safeguarding Officer	Kelly Jones Kelly.Jones@wolverhampton.gov.uk 01902 555937
S4S Safeguarding Lead/Specialist	Dr Sandra Wiseman 07786 582266 Sandra.wiseman@services4schools.org.uk
Partnership Strategic Exploitation Co-ordinator	Amy Cooper Amy.cooper@wolverhampton.gov.uk Hub email: WolverhamptonExploitationHub@wolverhampton.gov.uk 01902 550 523 / 07866 006144
Crimestoppers	0800 555 111
NSPCC	0808 800 5000 help@nspcc.org.uk claire.rose@NSPCC.org.uk (local contact) Whistleblowing Helpline: 0800 028 0285
Protect (independent advice for concerns about malpractice in the workplace)	020 3117 2520 http://protect-advice.org.uk
Childline	0800 1111 Childline.org.uk
Kidscape Bullying Helpline	0207 730 3300
National Domestic Violence Helpline	0808 2000 247 (24/7 helpline)
Men's Advice Line	0808 801 0327
The Mix (support for under 25's)	https://www.themix.org.uk 0808 808 4994
Samaritans	0845 790 9090
CEOP (Child Exploitation and Online Protection Centre)	www.ceop.gov.uk
Foreign and Commonwealth Office (Forced Marriages Section)	0207 008 8706
Forced Marriage Unit	fmu@fco.gov.uk Telephone: 020 7008 0151 (Monday to Friday 9am to 5pm) Out of hours: 020 7008 1500 (ask for the Global Response Centre)
Black Country Women's Aid Our Future - supports C&YP aged 5-11 who have witnessed DV at home YPA Contract - supports gang affected girls and young women who are at risk of rape/sexual violence or CSE. May be at risk because of family members	www.blackcountrywomensaid.co.uk info@blackcountrywomensaid.co.uk 0121 553 0090
Wolverhampton Prevent (Community Safety Team)	01902 551214 https://www.wolverhampton.gov.uk/community/prevent Deborah.smith@wolverhampton.gov.uk
National Prevent Advice Line	0800 011 3764
Channel Helpline	020 7340 7264
Harmful Sexual Behaviour Support Service	Swgfl.org.uk/harmful-sexual-behaviour-support-service/ 0344 2550623 hsbsupport@swgfl.org.uk
Online Behaviours Ltd	www.onlinebehaviours.co.uk 03334445806

(Equilibrium - problematic and harmful sexual behaviours intervention)	mark@onlinebehaviours.co.uk patrick@onlinebehaviours.co.uk
The Haven Wolverhampton (a single point of contact for women and men)	0800 019 4400 (24/7 helpline - including for professionals)
Karma Nirvana (support on forced marriage and honour-based crimes)	0800 599 9247
West Midlands Forced Marriage & Honour Based Abuse 24 Hour Multi-lingual Helpline	0800 953 9777
Broken Rainbow (for survivors of same sex domestic abuse)	0800 999 5428
Sexual Assault Referral Centre	0808 168 5698 (24/7 self-referral line)
Recovery Near You (for support with substance misuse)	0300 200 2400
The Refugee and Migrant Centre - Demi Gallear - Family Support Officer	1st Floor Roma Parva, 9 Waterloo Road, WV1 4NB 07884 721 709
Modern Slavery Helpline (for victims and professionals)	08000 121 700
Operation Encompass (Confidential Advice Line for Teachers who have concerns about a child who may be experiencing domestic abuse)	0204 513 9990 (Mon - Fri 8am - 1pm term time only)
Wolverhampton Homes - family's at risk of being made homeless	Christine Eccles Christine.eccles@wolverhamptonhomes.org.uk

All documents relating to Safeguarding are available on Sharepoint.

School Vision and Aims

Succeed Happy Inspire Nurture Educate

At Bantock Primary we promise you a caring community where everyone can **SUCCEED**. We provide a **HAPPY** and exciting environment to **INSPIRE** you to learn and grow. We will **NURTURE** your talents and **EDUCATE** you in everything you do.

We aim to encourage every child to SHINE at Bantock Primary

Statement of Intent - Duty of Care

*"Safeguarding and promoting the welfare of children is **everyone's** responsibility. 'Children' includes everyone under the age of 18. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests of the child**" (Keeping Children Safe in Education 2025)*

Bantock Primary school recognises it has a legal duty of care of all staff and takes seriously its responsibilities to protect and safeguard the interests of all children. Our school is concerned about the welfare and safety of its pupils and works to create a culture of security to enable them to feel valued, listened to and to know that their wishes and feelings are respected. Pupils have a fundamental right to be protected from harm. School should provide a caring, positive, safe and stimulating environment which promotes the social, physical, emotional and moral development of each pupil.

All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in a child protection or safeguarding issue will receive appropriate support. Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

Child Protection has to be considered within “professionals’” wider “safeguarding” responsibilities’ that include a duty to co-operate under the Children Act 2004. ‘Working Together’ requires all schools to follow the procedures for protecting children from abuse and providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Protection is a shared community responsibility.

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

- The Children Act 1989
- The Children Act 2004
- Education Act 2002 - Section 175/157
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2025
- What to do if you are worried a child is being abused March 2015
- The Prevent duty: departmental advice for schools and childcare providers, DfE June 2015
- Prevent Duty Guidance for England and Wales 2023
- Children Missing in Education: September 2016
- Multi-Agency Children Services Threshold Guidance: Continuum of Help and Support 2020
- The Human Rights Act 1998
- The Equality Act 2010
- The Public Sector Equality Duty (PSED)
- EYFS Framework 2025

Safeguarding Definition

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- **Children** includes everyone under the age of 18.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Principles

Our Safeguarding and Child Protection Policy ensures that everyone at Bantock Primary School adopts a **zero-tolerance** approach to abuse. We safeguard and promote the welfare of our students by:

- Knowing that safeguarding and promoting the welfare of children is everyone’s responsibility, whilst maintaining a professional attitude of **it could happen here** and acting without delay to protect our children by reporting anything that might suggest a child is being abused or neglected
- Ensuring that we practise safe recruitment in checking the suitability of all staff and volunteers to work with our pupils and prevent unsuitable people working with children and young people and maintaining an accurate and up to date Single Central Register (SCR)
- Raising pupil awareness of child protection issues and equipping pupils with the skills to keep them safe from all forms of abuse
- Supporting vulnerable pupils and those in difficult circumstances, as well as supporting those pupils who have been abused in accordance with their agreed protection plan
- Establishing a safe environment in which children can learn and thrive.
- Making adults who work with children understand their responsibilities regarding safeguarding and child protection (both online and offline) and that they are responsible for their own actions and

behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

- Providing effective, relevant, and ongoing training and development for all staff, governors and volunteers (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
- Maintaining clear procedures in line with the latest guidance for reporting allegations against staff members

We recognise that school staff are well placed to observe the outward signs of abuse and have a responsibility to take appropriate action. We will therefore:

- Establish and maintain an environment where our pupils feel safe and secure, and where they are encouraged to talk and are listened to seriously
- Ensure that our pupils know that there are adults in the school whom they can approach if they are worried or in difficulty or concerned about one of their peers
- Ensure all staff are aware of systems and policies within school which support safeguarding
- Include opportunities in the curriculum for pupils to develop the skills to recognise abuse and to stay safe, and also to include material to help pupils develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills.
- Ensure that, wherever possible, every effort will be made to establish working relationships with families and with colleagues from other agencies.
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child protection
- Keep meticulous, written confidential records of concern about children, (this includes reporting dates, times, people responsible and actions), and ensuring all records are kept securely and shared appropriately

Equality Statement

Some children have an increased risk of abuse, both online and offline, 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, and give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations - e.g. 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
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

It is the responsibility of all staff to consider the potential of abuse first and not simply see their behaviour as part of their SEN or disability. There are additional indicators staff need to be aware of; malnourishment, lack of stimulation, rough handling, ill-fitting equipment, misappropriation of a child's finances and deprivation of medication.

Practice

We recognise that it is the responsibility of each of us to ensure that all elements of this policy are actively and consistently reflected in our practice. We will systematically monitor, evaluate and constantly review the impact of this policy.

Victims and alleged perpetrator(s)

For the purpose of this policy, we, in places, use the term “victim”. It is a widely recognised and understood term. It is important that we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, we will be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

For the purpose of this policy, we, in places, use the term “alleged perpetrator(s)” and where appropriate “perpetrator(s)”. These are widely used and recognised, however, we will think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. The use of appropriate terminology will be determined as appropriate, on a case-by-case basis.

Roles and responsibilities

Safeguarding and child protection is everyone’s responsibility. This policy applies to all staff, supply staff, volunteers and governors in the school and is consistent with the procedures of our local safeguarding partners:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA

Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

The Full Governing Board is responsible for ensuring that:

- they have a strategic leadership responsibility for the school’s safeguarding arrangements
- they facilitate a whole school approach to safeguarding. This will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and that all systems, processes and policies operate with the best interests of the child at their heart.
- the school complies with legislation related to child protection
- the school has a Safeguarding Policy/Staff Code of Conduct and procedures in place, makes appropriate staff and volunteer checks and have procedures in place for dealing with allegations against staff
- the policy reflects the whole school approach to child on child abuse and includes policies reflected elsewhere (e.g. digital safeguarding, behaviour, SEND), low level concerns, allegations against staff and whistle blowing
- safeguarding policies and procedures are transparent, clear, easy to understand for staff, pupils, students, parents and carers
- this policy is reviewed annually
- the school is using safe recruitment procedures and ensures at least one member of the appointing panel has attended safer recruitment training
- appropriate checks are carried out on new staff and volunteers and records are up to date
- all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- the school has appropriate filtering and monitoring systems in place, and review their effectiveness.
- the Designated Safeguarding Lead (DSL) and any deputy DSL’s are properly trained and have time to carry out their duties and is a member of the Senior Leadership Team. This is also made explicit in the role-holder’s job description
- the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- the Safeguarding Policy is available to parents on request either via the school website or to view in school
- the school understands their role in the three safeguarding partner arrangements and contributes to inter-agency working in line with guidance and local authority procedures and practice
- children are taught about safeguarding, including online safety and Relationships and Sex Education

- relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR
- this child protection policy reflects the fact additional barriers can exist when recognising abuse and neglect in children with special educational needs or disabilities (SEND) or certain health conditions.
- all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.
- they are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements)
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Full Governing Board is responsible for maintaining:

- The nominated Governor having regular contact with the school's Designated Safeguarding Lead(s)
- An awareness of current responsibilities and requirements in relation to child protection by attending appropriate professional development activities.

All governors will read *Keeping Children Safe in Education* in its entirety

The Designated Safeguarding Lead/s is/are a senior member of staff (SLT) responsible for:

- the provision of leadership and vision in respect of safeguarding and child protection
- the practical implementation of the safeguarding policy in ensuring that child protection procedures are followed within the school and that appropriate referrals are made to the proper Social Care Services and other agencies (this includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep children safe online)
- ensuring all staff members receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- ensuring all staff understand the expectations, applicable roles and responsibilities in relation to the schools filtering and monitoring systems.
- safeguarding training, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- whilst considering training requirements, there will be regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of pupils.
- ensuring that the Designated Safeguarding Lead and the safeguarding team attend child protection training at least every two years and updates annually and keep up to date with relevant knowledge (e.g. via e-bulletins & DSL network events)
- undertaking more in-depth Prevent awareness training, including on extremist and terrorist ideologies in their roles of designated Prevent leads
- the co-ordination of all activities related to child protection and children in care, including record keeping, referrals to social care, school representation at child protection conferences and other related meetings, supporting pupils at risk, liaison with the Head teacher and other professionals, and the monitoring and evaluation of our child protection procedures
- ensuring that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral
- ensuring that all records are kept confidentially, securely and are separate from pupil records

- ensuring that if a child leaves the school their child protection file is copied and delivered securely to the Designated Person in the new school (within 5 days for an in-year transfer, or within the first 5 days of the start of a new term). Confirmation of receipt is to be obtained and kept on file.
- considering if it would be appropriate to share any information with the new school or college in advance of a child leaving to ensure support is in place for when the child arrives
- the liaison between the safeguarding team and the leadership team and governors
- liaising with the mental health lead where safeguarding concerns are linked to mental health
- promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- ensuring that any absence, without satisfactory explanation, of a pupil currently on the Vulnerable Children's Register is referred to the Education Welfare Officer and/or Social care
- meeting with the Education Welfare Officer to monitor children at risk and absences are logged and dated
- being the most appropriate source of support and advice to staff within schools on all child protection concerns
- providing, for the head teacher, a termly report detailing the number and type of incidents/cases, the number of children referred to social care and on the vulnerable children's register
- being the school's designated Prevent Leads and will also make sure that all staff have appropriate Prevent training and induction
- referring cases to the Channel programme where there is a radicalisation concern as required or supporting staff who do so
- referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service
- referring cases where a crime may have been committed to the Police: When to Call the Police
- consider whether children are at risk of abuse or exploitation in situations outside their families
- helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- taking the lead responsibility for safeguarding and online safety, which includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checking the schools filtering and monitoring systems are appropriate.
- being confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- being aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The Designated Safeguarding Lead (DSL) is **Mr Thomas**

The Deputy Designated Safeguarding Leads (DDSL's) are **Mrs McEntee, Mr Fullard & Miss Gulasova**

- The DSL or DDSL's will be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst our DSL or DDSLs will be available in person, there may be occasions, in exceptional circumstances when this is not possible, however they will be available via e-mail, phone or other such mediums.
- Our school will arrange adequate and appropriate arrangements for any out of hours/out of term activities involving pupils from the school.
- The LA will be updated with contact details for emergencies

The Head Teacher is responsible for:

- supporting the Deputy Designated Safeguarding Leads in all aspects of the role
- ensuring that the Deputy Designated Safeguarding Lead and the safeguarding team have received the appropriate training

- ensuring that all members of the school community and visitors (see appendix M) are aware of and comply with our safeguarding policy/staff code of conduct
- ensuring the safe recruitment of all staff (including supply staff and volunteers)
- making parents aware of the school's safeguarding policy
- dealing with any allegations against members of staff or volunteers
- creating a safe environment for pupils at the school
- providing a termly report to Governors detailing any changes to policy and procedures and training undertaken
- overseeing the safe use of technology, mobile phones and cameras in the setting

All staff are expected to:

- know the names of the Designated Safeguarding Lead and members of the safeguarding team
- understand and comply with the school's safeguarding, behaviour and social media policies
- have read, understood the relevant section(s) of the most recent 'Keeping Children Safe in Education' and signed a declaration that they have done so.
- understand if any member of staff is concerned about a pupil he or she must inform the Designated Safeguarding Lead immediately
- understand notes should be made about any concerns as quickly as possible
- know that they have a duty to share information with the designated lead, and through the designated leads with other agencies.
- be alert to signs and symptoms of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense and unresolved) and know how to respond when they have concerns or when a pupil discloses to them and to act confidentially
- know what and how to record concerns
- deal with any bullying incidents that may occur, following proper procedures.
- be aware of new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- understand that a child and their family may be experiencing multiple needs at the same time
- behave in accordance with our Staff Code of Conduct/Staff Handbook
- know that in the absence of the DSL or Deputy DSLs and there is a risk of immediate, serious harm to a child a referral should be made to children's social care immediately. **Anybody can make a referral** but the DSL should be informed as soon as possible
- be aware of the process for making referrals to MASH by using the E-MARF
- not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.
- understand if a child's situation does not appear to be improving, the staff member with concerns should press for reconsideration
- pay particular attention to the attendance, academic progress and physical, social and emotional development of any child who has been identified as at risk
- be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the DSL.
- know that they may be required to support other agencies and professionals in an early help assessment which should be kept under constant review and consideration given to referral to children's social care if the child's situation does not appear to be improving
- understand that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges
- know that if they have concerns, or an allegation is made about another member of staff (including volunteers and supply staff) posing a risk of harm to children, then the concern should be referred to the headteacher. If the concern is about the headteacher, the member of staff should report this to the chair of governors. Our staff will comply with the guidelines in part four of Keeping Children Safe in Education.
- understand how to raise concerns about poor or unsafe practice and potential failures in our school's safeguarding regime. Staff should follow the school's whistleblowing policy and procedures or contact the NSPCC whistleblowing helpline.

- be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication
- be aware that technology is a significant component in many safeguarding and wellbeing issues
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should the victim be made to feel ashamed for making the report.
- be aware of the seven golden rules for sharing information and if in any doubt about sharing information, speak to the DSL or DDSs. 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.
- know the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- recognise the fact that children can be at risk of harm inside and outside of their home, at school and online
- recognise the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

Pupils, parents/carers, supply staff and volunteers are expected to be aware of and comply with the school's child protection and conduct policies.

School Procedures

Staff will be kept informed about child protection responsibilities through inductions, staff newsletter and awareness training.

All new staff will attend a training session on child protection as part of their induction programme (including online safety which, amongst other things, includes as well as receiving the Staff Handbook/Code of Conduct and Keeping Children Safe in Education).

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes
(the term "children" includes everyone under the age of 18)

Contextual Safeguarding

At Bantock we know that safeguarding incidents and/or behaviours can be associated with factors outside our school and/or can occur between children outside our school. All staff, but especially the designated safeguarding leads (or deputy) will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children will consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Our DSL/Deputy DSLs will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Children's social care assessments should consider such factors, so our school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse

When to Be Concerned

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- is disabled
- has special educational needs (whether or not they have a statutory education health and care plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from education, care or home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- is viewing problematic and/or inappropriate online content (for example, linked to violence) or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol
- is suffering from mental ill health
- has returned home to their family from care
- is at risk of so-called 'honour' based abuse such as FGM or forced marriage
- is a privately fostered child
- has a parent or carer in custody or is affected by parental offending
- is missing education, or persistently absent from school, or not in receipt of full-time education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children (i.e. child on child abuse). A pupil may exhibit unusual behaviour and his or her progress at school alters dramatically or attitude changes. A pupil may have frequent or unusual injuries, not normally associated with the explanation offered. When a pupil indulges in sexual behaviour, either verbal or non - verbal, that is unusually explicit or inappropriate to his or her age. These signs and symptoms may include:

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 systems of, or deliberately induces illness in a child.

Emotional Abuse

Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only when they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of 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 need.
- non - attendance

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 (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside the clothing. They may include 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, 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.

Dealing with a Disclosure

- If a child discloses that he or she has been abused, the member of staff should:
- listen to what the child says
- take what the child says seriously
- keep an open mind
- accept what is being said
- allow the child to talk freely and dictate the pace
- reassure the child but not make promises which may not be possible to keep
- reassure the child - it is not his or her fault
- stress that it is right to tell
- listen; do not ask direct or leading questions, such as, what did he/she do next? Did he
- touch your private parts?
- Only when necessary only ask open questions e.g. anything else to tell me? And? Clarify the facts, don't interrogate
- do not criticise the perpetrator - the child may still love him or her
- explain what you have to do next
- record accurately and quickly using child's words / actions (see Recording and Reporting)
- inform the DSL of the disclosure

You should NEVER:

- take photographs or examine an injury
- interrogate with lots of questions;
- cast doubt on what the child is saying;
- investigate or probe aiming to prove or disprove possible abuse - never ask leading questions;
- make false promises to children about confidentiality or keeping 'secrets'. You have a duty to report the incident to the DSL and it may be necessary to inform social care
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;

- say anything that might lead the child to feel responsible;
- stop the child whilst they are freely recalling significant events or pushing them to tell you more than they wish;
- forget to record what you have been told;
- fail to pass the information on to the correct person;
- ask a child to sign a written copy of the disclosure
- tell the child to go and speak to someone else

For children with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

Barriers that may prevent a child from making a disclosure

- threats made by the perpetrator
- fears that something bad might happen
- lack of opportunity
- lack of understanding that they are being abused
- attachment to the perpetrator
- feelings of self-blame, shame and guilt
- language barrier
- cultural differences

It is important all adults are aware of these factors in the event of having concerns or feel that a child might be about to make a disclosure. It highlights the importance of being available, supportive and showing professional curiosity.

Barriers that may prevent an adult from reporting a concern

- fears of being wrong
- worried it might make things worse for the child
- concerns about splitting up the child's family
- worried about repercussions for the abused and the family
- worried about repercussions personally
- uncertainty about what happens next
- insufficient knowledge of the signs and symptoms of abuse
- belief that child abuse isn't a common problem

It is important that adults always pass on information, even if they have uncertainties about its significance or the consequences. Withholding information inhibits any action being taken and could mean that a child or young person continues to be abused.

Confidentiality

Members of staff and governors may have access to confidential information about pupils in order to undertake their responsibilities. In some circumstances the information may be highly sensitive.

Confidential or personal information about a pupil or her/his family must never be disclosed to anyone other than on a need to know basis and not shared using personal texts, personal emails, social media or any other forms of insecure forms of communication. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate or embarrass the pupil.

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay to those with designated child protection responsibilities.

Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security protected school equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required, governed by the “Data Protection Act 1998”. If a member of staff is in any doubt about the storage or sharing of information s/he must seek guidance from a senior member of staff. Any media or legal enquiries must be passed to senior management.

Multi-agency Working

Bantock will contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children. The SLT and the DSL/DDSLs understand their role in the new safeguarding partner arrangements.

We co-operate and engage fully with the new published safeguarding arrangements and will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Bantock will allow access for children’s social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

Our safeguarding arrangements will consider the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the three safeguarding partners. This will include understanding and reflecting local protocols for assessment and the threshold document along with supplying information as requested by the three safeguarding partners.

Multi-agency expectations for Headteachers/DSLs

- **Collaborate:** decisions are based on a shared practice approach and constructive debate and analysis of information from all services
- **Learn:** managers ensure their teams have time to engage in peer learning and knowledge exchange, peer audit, group supervision and observation
- **Resource:** managers ensure children receive the holistic support they need, drawing in expertise from a wide range of agencies
- **Include:** managers support staff to identify and challenge discrimination, disparity, and negative stereotypes
- **Mutual challenge:** constructive challenge within and across agencies and disciplines is actively encouraged, independent judgements are valued and given space alongside collective decision-making to avoid groupthink (*section 26, page 17 Working together to safeguard children 2023*)

Multi-agency expectations for teachers

- **Collaborate:** practitioners working with the same child and family share information to get a complete picture of what life is like for the child. Collectively, they ensure the child’s voice is at the centre and the right support is provided
- **Learn:** practitioners learn together by drawing on the best available evidence from their individual fields and sharing their diverse perspectives during regular shared reflection on a child’s development, experiences, and outcomes
- **Resource:** practitioners build strong relationships across agencies and disciplines to ensure they support and protect the children with whom they work
- **Include:** practitioners recognise the differences between, and are confident to respond to, circumstances where children experience adversity due to economic and social circumstances and acute family stress, and situations where children face harm due to parental abuse and neglect
- **Mutual challenge:** practitioners challenge themselves and each other, question each other’s assumptions, and seek to resolve differences of opinion in a restorative and respectful way (*section 27, page 18 Working together to safeguard children 2023*)

A good assessment should:

- build an understanding of the child’s strengths, interests, identity, and culture

- respond to each of the vulnerabilities and/or challenges that the child may be facing, including any within the home
- gather information on past experiences of trauma and how this may impact on the child's current experience of harm and on how they interact with practitioners
- explore how the child's experiences within their families and networks, including their friends and peer groups, interplay with the risk of harm outside of the home and identify what needs to change
- support parents, carers, and family networks to understand what is happening to the child, working with them to ensure they can best meet the child's needs and play an active part in the solutions and processes to help create safety for the child
- understand the risk of extra-familial harm for siblings, for example, where older children are exploited, younger siblings may also be at risk of being targeted (*section 196, page 68 Working together to safeguard children 2023*)

Information Sharing

Our Governing Board understand that sharing information is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. They understand that we have clear powers to share, hold and use information for these purposes.

To achieve the best outcomes for children and young people; to promote their welfare and safeguard them from harm, agencies need to work together. Children and young people's needs and circumstances can be complex and it is only by agencies coming together and working collaboratively that we can achieve a holistic assessment of the child or young person within their family and community and ensure that they receive the services that they need.

Effective inter-agency working is dependent upon effective information sharing whether a child or young person needs some additional support (early intervention) or whether there are concerns that they are at risk of significant harm.

If our school is unable to provide pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we should withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt our school will seek independent legal advice.

Where children leave our school, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt will be obtained from the receiving school or college. The file will be transferred separately from the main pupil file.

In addition to the child protection file, our designated safeguarding lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the Channel programme and have that support in place for when the child arrives.

The Seven Golden Rules of Information Sharing

1. **Data Protection legislation is not a barrier to sharing information** - Remember that the Data Protection Act 2018 / GDPR and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. **Be open and honest about information sharing** - with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. **Share information necessary, proportionate, relevant, adequate, accurate, timely and secure way:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. **Keep a record of your decision and the reasons for it** - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.
(*Information Sharing : Advice for practitioners providing safeguarding services to children, young people, parents and carers, DfE, July 2018*)

Recording and Reporting (Appendix B, C & D)

Well-kept records are essential in situations where it is suspected or believed that a child may be at risk from harm. All child protection records are clearly marked as such and are kept securely locked.

Individual Safeguarding Concerns must be uploaded onto Sharepoint (Safeguarding Staff>Recording & Reporting) within 24 hours and the DSL must be notified as soon as possible (or a DDSL in their absence). Records should;

- Specify who was present, time, date and place
- Capture the child's words wherever possible
- Remain factual - exactly what was said
- Clearly distinguish between fact, opinion, interpretation, observation and/or allegation;
- State what action was taken, by whom and any subsequent concerns and referrals
- Include, if appropriate, a child's body map to show location of bruises, scratches, etc
- Clearly record the full names of all adults and pupils at least once, and in the case of an external adult, their full job title. When names have been recorded in full once, they can be abbreviated to initials thereafter

The DSL/DDSL will review records once informed by the member of staff concerned and via an e-mail alert notification. These notes **must not** be destroyed, even if a more detailed report is written later. They may be needed in court.

File notes are kept for any pupil on an Early Help Assessment, Child in Need or Child Protection plan, or for any pupil monitored for child protection reasons. These records are kept in a locked cupboard and electronically on a secure area of the school communication system. 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 as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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.

Making Referrals

If, at any point, there is a risk of immediate significant harm to a child (Wolverhampton Threshold Model - see appendix E) a referral will be made to children's social care immediately. Where a child is

registered at school, consultation must take place with the school's DSL, via the Multi-Agency Safeguarding Hub (MASH), who will often be the most appropriate person to initiate any referral but anyone can make a referral. The schools internal recording form should be used to aid in the decision making process if a referral is needed to MASH (**Appendix B & Appendix N**)

For referral to the Multi-Agency Safeguarding Hub (MASH), phone 01902 555392 fax 01902 555329 and speak to the Duty Social Worker. (Out of hours 01902 552999). All referrals to MASH must be submitted via the electronic MARF system which can be accessed via the Wolverhampton Safeguarding Board Website at the following link: <https://marf.wolverhampton.gov.uk>

The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome.

Where children need a social worker, this should inform school decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Attendance at Vulnerable Children's Meetings & Child Protection Conferences

One of the Designated Safeguarding Leads will be expected to attend any vulnerable children's meetings, e.g. CIN or Child Protection Conference. If a child is made subject to a Child Protection Plan it may be more relevant for another member of the safeguarding team to attend the subsequent core group meetings. A gathering record will be completed prior to all meetings by the relevant adults in school connected to that child (Appendix I).

Professional Disagreements

Occasionally, situations arise when staff at Bantock may feel that the actions, inaction or decisions of another agency do not adequately safeguard a child. In such cases, staff will follow the Wolverhampton Safeguarding Board "Escalation Policy" which is available in the safeguarding policies on display in the staffroom or by clicking on the following link:

[WST Escalation Policy](#)

Supporting Families Facing Adversity

In the area of child protection there is a pyramid of need for the support of vulnerable pupils. At the top are those pupils on child protection plan and those pupils for whom we have major child protection concerns. Next are "children and young people in care" with the local authority, adopted children and those who are cared for by people other than a parent. Then we have those pupils who take the role as a significant carer for a family member. The Designated Safeguarding Leads are responsible for ensuring that we have an up to date list of these groups of pupils. The names of the vulnerable pupils are monitored and tracked by the safeguarding team only as confidential details are included on this list.

Next is a larger group of pupils who are vulnerable in some other way. This may be because of family circumstances, health issues or social reasons. Lastly there are the majority of pupils, who do not need on-going extra support but may need some support for a short period of time. This may be, for example, in the case of family illness, mental health, substance abuse, domestic violence, crisis or bereavement. The designated lead regularly checks our first aid/medical request log for pupils seeking medical assistance, so that we can identify concerns at an early stage. The school displays posters for ChildLine as a source of support for children who are worried about what is happening at home. The school website allows pupils to share worries or concerns about problems at home through a confidential reporting box. We are committed to providing support for all these groups of pupils appropriate to their needs. This may be provided by external professionals, the safeguarding team, a member of the senior leadership team, a phase leader, teacher, or any adult in school specifically approached to do so.

Children Missing from Education

A child being absent 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. The department's **statutory guidance** on school attendance **Working together to**

improve school attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

There are many circumstances where a child may be absent or 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

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 absent, 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.

Adding pupils to the admission register

When the school adds a pupil to their admission register, we must also add the expected start date. If the pupil subsequently does not arrive as expected the school will consider notifying the Education Welfare Officer at the earliest opportunity to prevent the child going missing from education.

Apart from pupils who join the school at the start of the school's youngest year, the school is required to notify the local authority **within five days** when a pupil's name is added to the admission register and provide all the information held within the admission register about the pupil.

Informing the local authority when a pupil leaves

When a pupil's name is deleted from the admission register (under one of the 15 reasons), the school will inform the local authority and supply the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives (where reasonably possible more than one emergency contact number should be obtained for each pupil)
- If applicable, the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there
- The name of the pupil's destination school and the pupil's expected start date there, if applicable, and
- The grounds under which the pupil's name is to be deleted from the admission register
- Where information is missing school will highlight to the local authority where they have been unable to obtain the necessary information from the parent, for example, in cases where the child's destination school or address is unknown.
- When a pupil leaves the school, the admission register must also record the name of the pupil's new school and the expected start date at the new school.
- For vulnerable pupils transferring to new schools, the school will forward any relevant information by hand where possible or by registered post and request written confirmation of receipt.

Leaving children unsupervised

The law does not specify an age when a child can be left unsupervised as maturity and understanding differs from child to child. It is important to understand that there are legal consequences that **may** result from a child being left unsupervised where it is felt that this was not safe for the child/children, or it placed the child/children at risk.

Even a short period of time alone can be distressing and lonely for a child. It is important to be aware that frequently leaving your child unsupervised can also constitute neglect, which is classed as a form of child abuse, therefore you can be prosecuted for it.

Age should not be used on its own to assess when you can leave a child unsupervised. You should also consider whether the child is mature enough to be able to cope with an emergency and how long the child is being left for. It is a good idea to discuss the possibility of being left alone with the child and ask them how they feel about it. It is sensible to consider the following aspects:

- How old is the child?
- What is the child's level of maturity and understanding?
- How long will the child be left alone for?
- How often will the child be left alone?
- Where will the child be left?
- Are there any other children involved?
- Are there any obvious risks?
- Would they know what to do in an emergency?
- How does the child feel about being unsupervised?
- Be aware that the length of the time the child is left alone for will affect whether it is reasonable to leave your child unsupervised.

Allowing an older sibling to look after a younger child

The following factors must be considered when children are walking to and from school in the care of a sibling:

- Have parents considered the risk/s posed by allowing their child to walk to/from school in the care of a sibling?
- How old are the children?
- How mature are the children? What is their level of understanding/awareness about being unsupervised walking to/from school?
- How comfortable are the children with the arrangements? (this includes the younger child and the older child who is acting as "carer")
- Have they assessed the journey to or from school for risks? Has the older child been involved in this risk assessment?
- How far will the children have to walk?
- How far away will they be? Will they be easily contactable?
- Do any of the children have additional needs - medical, emotional, behavioural, learning difficulties/disabilities? How will these be met in their absence?
- Does the older child know what to do in an emergency?
- If a parent requests for a child to walk to or from school unsupervised they will need to complete and sign a school letter (Appendix O)
- If a parent requests for a child to walk a younger sibling to or from school unsupervised they will need to complete and sign a school letter (Appendix P)

Pupils on the child protection register or for whom we have child protection concerns

The number of pupils on a child protection plan varies. There are also other pupils about whom we have child protection concerns who are not on a child protection plan. We support pupils in various ways by:

- following the guidance set out in any child protection plans
- ensuring they know and are comfortable about whom they can approach for help or if they have specific concerns
- monitoring their welfare carefully, including talking to them regularly about their well being
- attending any child protection meetings held on their behalf, including speaking on their behalf at such meetings should they request it
- monitoring their attendance carefully and reporting any unexplained absence to social care
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- enlisting the support of and liaising with other agencies as appropriate
- checking that they have access to all elements of school life, including visits and other activities

- informing their class teacher that they are on a CPP without breaching confidentiality so he/she knows to register immediately any concerns however minor with the designated child protection lead
- When a vulnerable pupil is missing education the school will consider whether it is appropriate to highlight any contextual information about a vulnerable child who is missing education, such as any safeguarding concerns.

Children and Young People in Care

We have a Designated Teacher (DT) responsible for children and young people in care, (including children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales). In the light of the research that shows that these pupils fare less well at schools than their peers and to narrow this gap, we monitor their progress and wellbeing carefully by:

- being aware of the legal status (interim care order, full care order, voluntary arrangements) of any looked after child
- the DSL having details of children's social workers and relevant virtual school heads
- being involved in and following the guidance set out in the pupil's personal education plan (PEP)
- arranging for one of our safeguarding team (or for another teacher to whom the child relates well) to take a particular interest in the pupil's welfare and to talk to them regularly
- offering in school support such as counselling or social skills training as appropriate
- targeting pupil premium specifically to support children and young people in care.
- attending any liaison or review meetings held on their behalf, including speaking for them or acting as their advocate at such meetings should they request it, and keeping in touch with social workers and/or carers
- monitoring their attendance carefully and reporting any unexplained absence to social care and the Educational Welfare Officer
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- informing their class teacher that they are looked after without breaching confidentiality so he/she knows to register any concerns speedily to the DT
- being careful not to accept any under achievement just because the child is in the care system
- looking out for difficulties with homework or resources that may be a result of their being in care and giving them help to organise and manage their work and by providing the resources needed
- enlisting the support of and liaising with other agencies as appropriate
- checking that they have access to all elements of school life, including visits and other activities, and by giving these pupils the opportunities to take part in those self-esteem projects/residentials organised by the school as and when appropriate
- understanding that a child previously in care potentially remains vulnerable and staff will have the skills and knowledge to keep these young people safe

The role of the "Virtual School Head" includes a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children with a social worker. In offering advice and information to workforces that have relationships with children with social workers, virtual school heads should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children. This should include DSL's, social workers, headteachers, governors, SENCO's, mental health leads and other local authority officers.

Young Carers

The DSL is responsible for those pupils who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement. We offer support to these pupils appropriate to their individual situation. Support may also be available from the Local Authority Young Carers Team and their referral form can be found [here](#).

Elective Home Education

Many home educated children have an overwhelmingly positive learning experience. Bantock Primary expects the parents' decision to home educate to be made with their child's best education at the heart of the decision.

Where a parent/carer has expressed their intention to remove a child from Bantock with the view to educating at home a meeting between the LA, school and other key professionals and parents/carers should take place. This meeting is particularly important where a child has SEND or certain health conditions, is vulnerable and/or has a social worker.

SEND

AT Bantock, we are aware that children with special educational needs and disabilities or certain health issues may face additional safeguarding challenges, both online and offline. They are also three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEND and certain medical conditions can be disproportionately impacted by things like bullying - without outwardly showing any signs
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, and
- communication barriers and difficulties in overcoming these barriers
- cognitive understanding - being unable to understand the difference between fact and fiction in online context and then repeating the context/behaviours in school or the consequences of doing so

We will ensure we have the appropriate mechanisms in place to assist these children. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL's or DDSL's and the SENCo.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

LGBTQ+

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. We also recognise that LGBTQ+ children are more likely to experience poor mental health.

When families are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children. When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Self-harm and suicidal ideation

'Self-harm' means injuring yourself deliberately. It's most often associated with cutting, but can also involve burning, hitting or punching, substance use, or eating disorders

A child may self-harm:

- As a coping mechanism, to feel more in control or to deal with negative or overwhelming feelings
- As a form of release - to change emotional pain into physical pain, or to relieve feelings of numbness, anger or aggression

- To punish themselves
- To send a sign that they're distressed
- Ultimately, it's a visible sign that something is not right

When someone self-harms, their body releases a rush of chemicals, giving them an unnatural sense of calm. This gives them some respite from their feelings. But the episode is normally followed by an extreme low, with guilt and shame. Self-harming can begin at any age, although it most commonly starts between 13 and 15. While any child could be at risk, there are some factors that put some children more at risk than others. Triggers could include (this list is not exhaustive):

- Bullying
- Family breakdown
- Pressure to do well at school
- Influence of media and peer groups, which may appear to glamourise self-harm
- Feeling rejected, having a poor self-image, and self-blame
- Bereavement
- Having a traumatic experience
- Having a learning difficulty

Some of the signs of potential self-harm are the same as for other safeguarding or mental health issues, for example:

- Having unexplained accidents or injuries that look like they could be self-inflicted, including cuts, bruises or cigarette burns on wrists, arms, thighs and chest
- Covering up, even in warm weather, and avoiding situations where they might be expected to wear more revealing clothing or take clothing off (for example, not taking off jumpers for PE)
- Having sharp items in their belongings
- Expressing self-loathing and a desire to hurt or punish themselves
- Changes in socialising, eating and sleeping patterns: for example, becoming withdrawn and isolated, blaming themselves for problems, unusual weight loss or gain, which they might try to hide by wearing loose clothing or being secretive about eating
- Low self-esteem, isolation, irritability and mood changes
- Not doing as well at school
- Losing interest in hobbies

The term 'suicidal ideation' essentially means 'having suicidal thoughts'. These could range from a child having passive or abstract thoughts about ending their life or feeling that people would be better off without them, to thinking about methods of suicide and actively making a plan to do it. Any child could be at risk, but there are some triggers that can make some children more at risk than others. Some of the triggers that are most likely to put a child at risk are:

- Family breakdown
- Relationship problems (with friends, family or peers)
- Bereavement
- School problems and test pressures
- Bullying, including cyber-bullying
- Having a family history of suicide
- Physical illness
- Physical and sexual abuse
- Sexuality

While there are many different potential triggers, the shared point across them is that a child is struggling to cope with a problem or issue in life and can't see a way out of it. Please note that some of these triggers are the same as for self-harm: family breakdown, bullying, and school problems and test pressures.

Staff will:

- Report their concerns to the DSL and/or mental health lead, in line with school policy
- Speak to the child and listen to them to find out more about what's going on for them, so the child can get any further professional help they need

When it comes to talking to a child:

- It's best for a member of staff with a good relationship with the pupil to do this
- If staff are uncertain about having the conversation, or have personal experiences of self-harm or have personal experiences of suicide, they should speak to the DSL or mental health lead for support
- If staff feel confident and have concerns about a child, they shouldn't wait for the DSL or mental health lead and miss an opportunity to talk to the pupil. For example, if a staff member works closely with the pupil and notices something that they're concerned about, they should go ahead and speak to the child first, and fill the DSL in afterwards, so they don't potentially miss an opportunity to help the child
- The mental health lead or DSL will co-ordinate a plan of action, including making a referral to child and adolescent mental health services (CAMHS) if needed

If a mental health concern is also a safeguarding concern staff will take immediate action and follow our safeguarding procedures to report it. If a child is in immediate danger, for example if your member of staff think a child is going to harm themselves, they should stay with the child, talk to them, and get support from the DSL as soon as possible. If the DSL isn't available, they can make a referral to children's social care, CAMHS or the child's GP themselves, or call 999 if appropriate. Similarly, if a child needs medical attention, they should get it either within school or by calling 999.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines and sexual exploitation.)

As a school, staff we should be aware that sexual and criminal exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit external signs of abuse.

Vulnerability Factors

- living in a chaotic or dysfunctional household
- history of abuse
- living in residential care, hostel, B&B or being homeless
- gang association either through relatives, peers, intimate relationships or neighbourhood
- lacking friends from the same age group
- attending school or are friends with young people who are sexually exploited
- not engaging in education/training or employment
- unsure about their sexual orientation or unable to disclose sexual orientation to their families
- learning disabilities
- young carer

- recent bereavement or loss
- low self-esteem or self-confidence

Behaviour & Risk Indicators

- older boyfriend/girlfriend
- gang involvement/association
- missing from home or care
- physical injuries
- drug or alcohol misuse
- involvement in offending
- repeat sexually-transmitted infections, pregnancy and terminations
- evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- disclosures made then withdrawn
- unexplained money or gifts and unexplained mobiles
- absent from school
- bullying in or out of school
- change in physical appearance
- recruiting others into exploitative situations
- family involvement in sexual exploitation
- poor mental health
- self-harm or thoughts of/or attempts at suicide

Also refer to DFE guidance 'What to do if you suspect a child is being sexually exploited'.

Child Trafficking

Child trafficking is the recruitment and movement of children for the purpose of exploitation. It is a form of child abuse. Identifying if a child has been trafficked is not easy. Trafficked children are often hidden; they may be scared or unaware that they have been trafficked.

There is a wide variety of reasons why children are trafficked to the UK, including:

- Sexual exploitation work or labour exploitation
- Domestic servitude in private homes or criminal activity
- Drugs trafficking
- Illegal inter-country adoption or forced marriage
- Removal of organs.

Traffickers can be parents, family members, organised gangs or individuals - they can be men or women. Victims of trafficking may find it difficult to speak out because:

- English is not their first language
- They are frightened of their abusers or of retribution
- They are frightened or suspicious of adults who are trying to help them
- They fear for their immigration status or fear getting a criminal record
- They may not see themselves as victims
- They have a false sense of loyalty to their abuser, including a sense of respect for elders and not wanting to get them into trouble.

It can be difficult to identify a trafficked child, but the following are possible indicators:

- Children have no documents when registering with school (birth certificate or passport)
- It is unclear who the child lives with or the relationship between the child and carer is unclear
- The adult speaks for the child
- Children look intimidated and behave in a way that does not correspond with behaviour typical of children their age
- Children and young people being overly tired in school
- Not being registered with a school or a GP practice, or appearing to change school and GP frequently

- Symptoms of STIs or pregnancy, signs of sexual or physical assault, poor dental health
- Poor school attendance with no or vague explanation/s given for absences
- Receiving repeated unexplained or unidentified phone calls
- Seen entering or leaving vehicles driven by unknown adults
- Possesses money or goods not accounted for
- Having a history with gaps and unexplained moves or going missing for periods
- Having what appears to be a prepared story, which lacks credibility.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Bantock provides outdoor-safety lessons run by teachers or by local PCSO's. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

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

A young person's involvement in county lines often leaves signs such as:

- Persistently going missing from school or home and/or being found out of area
- Unexplained acquisition of money, clothes, or mobile phones

- Excessive receipt of texts/phone calls and/or having multiple handsets
- Relationships with controlling/older individuals or groups
- Leaving home/care without explanation
- Suspicion of physical assault/unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results/performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Key terms which may give an indication that a child or older sibling is involved in County Lines include:

- Going Country, Out of Town, OT (travelling to another town to deliver drugs or money)
- Burner (cheap disposable phone)
- Trapline (phone used for purpose of selling drugs)
- Cuckooing (taking over a vulnerable person's home to use and sell drugs)
- Trap House (building used as a base from where drugs are sold and stored or sometimes manufactured)
- Plugging (hiding drugs in body cavities)

If we believe a pupil may be at risk of county line exploitation the school will follow local safeguarding guidance. If we believe a pupil is in immediate risk of harm the school will contact the police.

For further information please read "Criminal Exploitation of Children and Vulnerable Adults: County Lines guidance" (Home Office September 2018)

Child on Child Abuse

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse (including online) and that it can happen inside and outside of school. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting (also known as sharing nudes and semi-nudes);
- Initiation/hazing type violence and rituals;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. Anyone, of any gender, can be a victim.
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual use of nude and semi-nude images/videos.

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

At Bantock we will actively challenge inappropriate behaviour between peers in order to minimise the risk of allegations against other children through:

- providing a developmentally age appropriate PSHE, RSE, British Values curriculum which develops children's understanding of acceptable behaviour and keeping themselves safe;
- systems (which are well promoted, easily understandable and easily accessible) for children to confidently report abuse, knowing that they concerns will be treated seriously;
- recognising that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not reported;

- recognition of the gendered nature of child on child abuse, that all child on child abuse is unacceptable and will be taken seriously;
- staff recognising, acknowledging or understanding the scale of harassment and abuse and not downplaying some behaviours related to abuse which can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenario a culture that normalises abuse and leading to children accepting it as normal and not coming forward to report it.

All staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal), inside or outside of school and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. All staff need to be aware that some groups are potentially more at risk, i.e. girls, LGBT, children with SEND or certain health conditions. The guidance (KCSIE 2025 Part 5) will be followed to manage such alleged cases.

At Bantock we are aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is **not** an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Recognising, acknowledging and understanding the scale of the harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

Sexual harassment means “unwanted conduct of a sexual nature” that can occur online and offline. For this policy, reference to sexual harassment is in the context of child on child sexual harassment. Sexual harassment is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes.
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting (this is a criminal offence)
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Consensual and non-consensual sharing of nude and semi-nude images and/or videos
 - Sharing of unwanted explicit content
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including on social media
 - Sexual exploitation, coercion and threats, and
 - Coercing others into sharing images of themselves or performing acts they're not comfortable with online

We will consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family. Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person

- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video, they must report it to the DSL immediately.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors.

The DSL and DDSL's will have a good understanding of HSB. This will form part of their safeguarding training. This will aid in our planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support. The school will follow the Multi-Agency Practice Guidance on Harmful Sexual Behaviour from Wolverhampton Safeguarding Together and will be used alongside the Brook Traffic Light Tool (which the DSL and DDSL's have received training in) to help guide decision making in the identification of, and support provided to, children and young people who may present with behaviours that could be sexually harmful.

Legislation - Sexual Assault

A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. This covers a wide range of behaviour so a single act of kissing someone without consent, can still constitute sexual assault.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is about having the freedom and capacity to choose. **A child under the age of 13 can never consent to any sexual activity.**

The school will carefully consider any report of sexual violence and/or sexual harassment. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- whether there have been other victims

- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children or school staff; and
- other related issues and wider context
- we are aware that sexual assault can result in a range of health needs, including physical, mental and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC)
- it will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

At Bantock all reports of child on child abuse, including sexual violence and sexual harassment will be managed in line with this policy, Part 5 of Keeping Children Safe in Education (DfE September 2025).

We will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, generally, our school will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this will not stop our school taking immediate action to safeguard our children, where required.

Our school will consider four likely scenarios when managing any reports of sexual violence and/or sexual harassment.

We will either manage the report:

- Internally
- Consider early help
- Refer to social care
- Report to the police

In all scenarios decisions and actions will be regularly reviewed and relevant policies will be updated to reflect lessons learnt. We will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. We will consider whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

We should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. We will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

Considering Confidentiality and Anonymity

We will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask us not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice will be sought from the designated safeguarding lead (or deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will be explained to the victim and appropriate specialist support should be offered.

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, we should be aware of anonymity, witness support and the criminal process in general so we can offer support and act appropriately.

We will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

We will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

The school will consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual

behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice, as appropriate, from children's social care, specialist sexual violence services and the police.

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made.

It is important that if the alleged perpetrator(s) does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

Discipline and the alleged perpetrator(s)

Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. We will carefully consider this on a case-by-case basis. The designated safeguarding lead (or a deputy) will take a leading role. We will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care should help us make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is considering the same facts.

Discipline and support

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. We will be very clear as to what our approach is. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. We will be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

Working with parents and carers

We will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. We will carefully consider what information we provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and it and we will work with the relevant agencies to ensure a consistent approach.

We will meet the victim's parents or carers, with the victim present, to discuss what arrangements are being put into place to safeguard them and to understand their wishes in terms of support and how the report is progressing.

We will meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the

victim and what this means for their education. The reason behind any decisions will be explained. Support for the alleged perpetrator will be discussed.

Safeguarding other children

Consideration will be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence or sexual harassment, it is likely that some children will take “sides”. The we will do all we can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed - this includes online and school transport.

Our whole school approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at Bantock are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

We will keep our policies, processes, and curriculum under constant review to protect all their children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and will be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in school may also be reflective of the wider issues within a local area and it would be good practice to share emerging trends with our safeguarding partners.

SWGfL and the Marie Collins Foundation have launched a Harmful Sexual Behaviour Support Service “Harmful Sexual Behaviour Support Service” which provides advice to professionals across England, who encounter, or have concerns about harmful sexual behaviour among the children and young people they work with. IT is available Monday to Friday 8am to 8pm on 0344 225 0623 or hsbsupport@swgfl.org.uk

It includes good information about context and normal behaviour, with the advice being to professionals is “not to wait for proof” of harmful sexual behaviour but to tackle incidents and behaviours early, which will lead to better outcomes than waiting for the behaviours to increase in severity.

School may also refer to the Child Sexual Abuse Response Pathway; an interactive online resource to guide professionals through how they can protect and support children and their families when there are concerns of sexual abuse.

Additionally, the Lucy Faithfull Foundation in collaboration with the Home Office, has developed ‘Shore Space’, an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else’s sexual thoughts and behaviour.

Serious Violence

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

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

In addition, the likelihood of involvement in serious violence may be increased by factors such as:

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

Staff should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

If there concerns that a child/young person is at risk from exploitation (Sexual, County Lines, Gangs, and/or Modern Slavery exploitation) an “Exploitation Screening Tool” (see appendix K) is to be completed in addition to local safeguarding procedures. For further exploitation support, advice and guidance contact the Exploitation Hub on WolverhamptonExploitationHub@wolverhampton.gov.uk

Diversity

Although no culture sanctions extreme harm to a child, cultural variations in child rearing patterns do exist. A balanced assessment must incorporate a cultural perspective but guard against being over-sensitive to cultural issues at the expense of promoting the safety and well-being of the child.

‘Fear of being accused of racism can stop people acting when they otherwise would. Fear of being thought unsympathetic to someone of the same race can change responses. Every organisation concerned with the welfare and protection of children should have mechanisms in place to ensure equal access to services of the same quality, and that each child, irrespective of colour or background, should be treated as an individual requiring appropriate care.’ - (Victoria Climbié Inquiry Report).

Research also shows that children with special needs are at an increased risk of abuse. There are fewer signs and indicators and more possible explanations. Children with communication difficulties may be especially vulnerable.

Some children and young people may be more vulnerable to abuse due to particular circumstances such as:

- young women subject to honour/gender based violence (where, for instance, they have transgressed the expectations of them as young women in their family and community)
- children at risk of harm from abuse linked to a belief in spirit possession on the part of their parent, carer or wider community
- girls at risk of genital mutilation (usually being taken back to their country of origin for this procedure to be carried out)
- children being trafficked into other families from abroad
- girls and/or boys at risk of being forced into marriage
- violent extremist radicalisation (a social process used to influence and manipulate vulnerable individuals who may be susceptible to extremist messaging)

Breast ironing/flattening

Breast flattening, also known as breast ironing, is the process during which young pubescent girls’ breasts are ironed, massaged, flattened and/or pounded down over a period of time (ranging from a few weeks to years) in order for the breasts to disappear or delay the development of the breasts entirely. In some families, large stones, a hammer or spatula that have been heated over hot coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts to prevent them from growing. Breast flattening usually starts with the first signs of puberty, it is usually carried out by female relatives.

It should also be acknowledged that some adolescent girls and boys may choose to bind their breast using constrictive material due to gender transformation or questioning their identity, and this may also cause health problems.

Health Implications

Due to the type of instruments that may be used, the type of force and the lack of aftercare, significant health and developmental issue may occur, such as:

- Severe Pain
- Fever
- Dissymmetry or disappearance of breast/s
- Itching
- Tissue damage
- Infection
- Discharge of milk
- Breast cancer
- Abscesses or cysts
- There may also be an impact on the child's social and psychological well-being

Prevalence

There has not been extensive research done on breast flattening and the few studies that have been carried out indicate that the practice occurs predominantly in Cameroon. Other countries include: Togo, Chad, Kenya, Guinea Bissau, South Africa, Cote d'Ivoire, Benin and Zimbabwe.

Signs that a girl could be at risk

- A girl is embarrassed about her body
- A girl is born to a woman who has undergone breast flattening
- A girl has an older sibling or cousin who has undergone breast flattening
- References to breast flattening in conversation, for example a girl may tell other children about it
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- A girl from an affected community is withdrawn from PSHE and/or Sex and Relationship Education as her parents wish to keep her uninformed about her rights and her body.
- One of either parents or elder family members consider breast flattening integral to their cultural identity.
- The family indicate that there are strong levels of influence held by elders who are involved in bringing up female children and support breast flattening.

As well as keeping in mind the signs that indicate a girl may be at risk of breast flattening, professionals and others should be mindful that:

- A girl may disclose to a teacher, social worker, GP or another medical professional
- Some girls may ask for help, perhaps talk about pain or discomfort in their chest area, but may not be explicit about the problem due to embarrassment or fear
- A girl may display reluctance to undergo medical examination
- A girl may be fearful of changing for physical activities due to scars showing or bandages being visible

Law in the UK

CPS legal guidance makes clear to police and prosecutors that breast-ironing is a crime that can be caught under existing law, even if it is said that the victim has consented.

The offences to be considered by prosecutors include child cruelty and causing or allowing a child to suffer serious harm. Both crimes are punishable by up to ten years in prison. Assault charges would also be available to prosecutors

If any member of staff is concerned that a girl is at risk of breast flattening, they must speak to the DSL/DDSL immediately. The DSL/DDSL will contact the MASH and make a referral.

Domestic Violence

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The Domestic Abuse Act 2021 (part 1) defines domestic abuse as any of the following behaviours, either as a pattern or behaviour, or as a single incident, between 2 people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

In 90% of cases of domestic abuse, children are in the same or the next room when an incident happens. Children directly witness 75% of abusive incidents. Even where children do not directly witness violence, living with coercive, controlling behaviour in the home can severely affect them. The impact of this early trauma can last a lifetime, and may include:

- Anxiety, fear and confusion: in younger children this may be expressed through tummy aches, biting nails, tantrums, and in older children and young people through panic attacks, depression and self-harm;
- Anger and disruptive behaviour towards authority figures
- Harm to physical, emotional, cognitive and social development leading to behaviour problems, poor academic achievement, illness, and depression
- Increased risk of being taken into care or of becoming a victim of child abuse, up to 40% of child abuse victims report domestic abuse in the home, and domestic abuse is a factor in 93% of serious case reviews concerned with child deaths
- Disrupted family dynamics, with parenting and attachments destabilised by domestic abuse
- Risk of becoming a victim of grooming, exploitation, or abuse in their own relationships
- Risk of becoming abusive to others

If we have concerns that a child or parent is experiencing or at risk of domestic violence the DSL will attempt to make contact with the victim having regard for the following:

- Is it conducive to ask?
- Is it safe to ask?
- Never asking in the presence of another family member, friend or child.
- Using an appropriate professional interpreter (never a family member).

It is important to validate and believe what's happening to the individual and send important messages such as "You are not alone", "You are not to blame for what is happening to you", "You do not deserve to be treated this way." **Call 999 if in immediate risk.**

If appropriate, a DASH Risk Identification Checklist is to be completed by school with the victim which can be found at the following link: [DASH RIC](#)

Following the outcome of the checklist and if we believe the victim is at serious risk of harm due to domestic abuse, a referral to MARAC will also be completed which can be found at the following link: [MARAC Referral](#)

It is important to remember that MARAC is a confidential process. Information shared at MARAC should not be disclosed to the victim/perpetrator. The MARAC process is for relevant professionals only. An E-MARF will also be completed following normal school protocol.

Bantock Primary also receives email alerts regarding domestic abuse via “Operation Encompass” notifications, which are sent directly to the DSL. Children will be supported in school and if felt necessary an additional screening tool/referral may be made to Black Country Women’s Aid (see appendix Q). This is also particularly relevant for any pupil who may have witnessed domestic abuse historically, or where professionals suspect domestic abuse is occurring, or about to occur.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable support to be given to the child according to their needs.

In addition, there is now a Teachers’ Helpline to assist school staff in supporting children who may be experiencing domestic abuse. Funded by the Home Office, this helpline is available Monday to Friday from 8am to 1pm throughout term time and will provide school staff with the opportunity to seek guidance, information and support from educational psychologists.

Our school/college will make use of the advice and links available in Keeping Children Safe in Education (Annex B) to identify and support children who are affected by domestic abuse and how they can be helped.

For additional resources, please also visit the website: <https://www.operationencompass.org/>

Honour Based Abuse (Including Female Genital Mutilation and Forced Marriage)

So-called “honour-based” abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. ALL staff will speak to the designated safeguarding lead or deputy about any concerns about female genital mutilation. 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.

Indicators that FGM has already occurred include:

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

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE

- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs - for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her leg

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

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

A girl:

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

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. **Those failing to report such cases will face disciplinary sanctions.**

It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with our school's/academy/college designated safeguarding lead or deputy and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow local safeguarding procedures.

At Bantock, teachers must also report their concerns and share the information with the designated safeguarding lead or deputy following the school's procedures for recording and reporting. The teacher will be supported by the designated safeguarding lead to fulfil their duty to report FGM cases to the police and social care.

Refer to @Female genital mutilation: multi agency practice guidelines' (Gov.uk), 'Female Genital Mutilation Risk and safeguarding' (Department of Health).
See appendix L for FGM Fact Sheet

FOR SPECIALIST ADVICE: Ring NSPCC Helpline **0800 028 0285** - line is available from 8am to 8pm Monday to Friday. Email help@nspcc.org.uk.

Forced Marriage

The subject of forced marriage is also highlighted in Safeguarding Children and Safer Recruitment in Education. Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents. Once again, schools can be seen as being in the front line in protecting young people from this type of abuse. A pupil who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear, that the proposed holiday will result in a forced marriage, may only become apparent after a number of conversations. These young women may also become victims of what is termed honour-based violence.

The Prevent Duty

"Prevent" is a strand of the government's broader strategy to counter the threats posed to society by extremism and terrorism.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

It is important to note that extremism is not the same as terrorism as not all extremist groups will commit terrorist or violent acts.

Schools have a duty to prevent children from being drawn into terrorism. Our DSLs who are our designated Prevent leads, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They will ensure that staff have access to suitable training to enable them to identify children at risk.

Publicly-funded schools must teach a broad and balanced curriculum and promote community cohesion through the spiritual, moral, social and cultural development of pupils.

The aim of 'Prevent' is to stop people becoming or supporting terrorists and to do this by challenging ideologies, protecting vulnerable individuals and supporting institutions, such as schools. It is part of the National Counter Terrorism Strategy known as CONTEST.

Factors that could make someone susceptible to become involved with terrorism:

- Low self confidence
- Sense of belonging
- Economics
- Abuse
- Isolation
- Friendships
- Revenge
- Disillusionment (culture/religion/life in general)
- Family / peer influence
- Religion
- Anger
- Change in family circumstances
- Lack of purpose
- Guilt from leading a “sinful” life

Behaviours that may give cause for concern

Emotional	Verbal	Physical
Change in mood Withdrawn Aggressive New found arrogance Low self-esteem Easily upset New confidence Determined Depressed Offensive Deterioration in academic progress	Outspoken Inappropriate language Preaching religious references Talk of websites Unresponsive Code language Questioning Fixated on a subject	Clothing Appearance Body language Use of social media Associating with different people Tattoos Tired Role play Drawing symbols

What actions will Bantock take to safeguard our pupils from radicalisation?

Bantock Primary School will help to protect children from extremist and violent views in the same ways that we help to safeguard children from drugs, gangs and alcohol through:

- Reviewing the curriculum, and pupil participation and safeguarding processes
- Exploring and promoting diversity and shared values between and within communities through the schools PSHE programme
- Challenging Islamophobia, anti-Semitism and other prejudices
- Building ties with all local communities, seeking opportunities for linking with other schools

The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and the country’s values. Awareness of Prevent and the risks it is intended to address are vital.

Staff can help to identify children whose behaviour suggests that they are being drawn into terrorism or extremism. These children can then be referred to the relevant agencies.

- Assess the risk of pupils being drawn into terrorism, and having robust safeguarding policies in place to identify pupils at risk and refer them to relevant authorities
- Work in partnership with other local bodies and following local authority inter-agency procedures
- Ensure staff are trained to identify pupils at risk of being drawn into terrorism, challenge extremist ideas and refer children to appropriate authorities where necessary
- Ensure the school has internet filters in place to block terrorist and extremist material

Our school will use the e-learning links outlined in KCSiE if required. Our school will utilise The Department for Education advice for schools on the Prevent duty and other links and guidance outlined in KCSiE.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school, if required, will attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages

Recording and Reporting

If you have any concerns in relation to individuals being vulnerable to extremist behaviours, you have a duty to complete the "PREVENT REFERRAL FORM" (see Appendix H) and email to:

CTU_GATEWAY@westmidlands.police.uk

Contact Number : CTU Prevent HUB 0121 251 0241

In addition please cc the following into the email:

0256 PC Pamy Sandhu (Prevent Officer WMCTU, West Midlands Police 101 ext 871 3033 / 07765295937)

Counter terrorism hotline: 0800 789 321

Alternatively, our school will contact the Wolverhampton Community Safety Team at:

<https://www.wolverhampton.gov.uk/community/prevent> or call: 01902 551214

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 Note that this is not for use in emergency situations

For further information, please see DfE guidance which can be found [here](#). Alternatively The Prevent Duty Guidance from the Home Office can be found [here](#).

Fabricated/Induced Illness (FII)

Fabricated or induced illness in children is a difficult and complex subject. It occurs when a child is presented for medical attention with signs or symptoms which have been fabricated or induced by the child's carer. This is usually, though not exclusively, carried out by a female carer. The following factors may be a sign of the possibility of FII:

- Frequent and unexplained absences from school, and from particular lessons/activities, especially PE
- Regular absences to keep a doctor's or a hospital appointment, where no reason has been given.
- Regular failures to keep medical and other health related appointments e.g. opticians, physiotherapists.
- Refusal of permission for school medicals and/or other school based health related checks (e.g. hearing).
- Repeated claims by the parent/s that a child is frequently unwell and requires medical attention for symptoms which are vague or difficult to diagnose.
- Frequent illness, exaggeration of symptoms or excessive treatments or ailments not consistent with the child's general health or, in relation to a child's disability.
- Parent/carer alleges the child has psychological difficulties.
- The child's supposed symptoms are only mentioned when the parent or carer is present.
- The parent/carer appears to have an unusually high level of knowledge about medical matters.
- Documents or other sources indicate that the parent/carer has changed doctors frequently, and/or has visited different hospitals for the child's treatment.

Where a teacher or other member of staff has reasonable cause to believe that a child is at risk from, or is the subject of FII, the school's safeguarding procedures will apply. Staff should refer any child welfare concern to the Designated Safeguarding Lead.

Digital Safeguarding

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

- **Content** - being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation and conspiracy theories
- **Contact** - being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The best protection is to make pupils aware of the dangers through curriculum teaching particularly computing and on-line safety, PSHE and SRE.

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

The Governing Board will ensure that online safety is a running and interrelated theme whilst devising and implementing our whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL's/DSL's and any parental engagement.

The police will be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of [generative AI in education](#).

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the [National Education Network](#). In addition, schools and colleges should consider taking appropriate action to meet the [Cyber security standards for schools and colleges](#) which were developed to help them improve their resilience against cyber-attacks. Broader guidance on cyber security including considerations for governors and trustees can be found at [National Cyber Security Centre](#)

Bantock recognises AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of ‘deepfakes’, where AI is used to create images, audio or video hoaxes that look real.

Bantock Primary will treat any use of AI to access harmful content or bully pupils in line with this policy as well as our behaviour and anti-bullying policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Curriculum

The school will ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

We will teach about online challenges and hoaxes and share this information about this with parents and carers.

Relevant topics will be included within Relationships Education and Health Education. In teaching these subjects we will have regard to the statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares our pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. We will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school’s behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE and reinforced throughout the whole curriculum. The programme will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities).

Personal safety and safeguarding is taught through specific subjects, the themed curriculum, assemblies and the extended curriculum. Areas covered include

- anti-bullying
- respecting others
- safely exploring their own attitudes and other’s attitudes
- recognising and managing risks in different situations
- how to behave responsibly
- Relationships Education and Relationships and Sex Education

- fire safety education programme
- internet safety
- community liaison support (police)
- culture, faiths and beliefs

Protecting yourself against allegations of abuse

You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- work in a room where there is a glass panel in the door or leave the door open
- make sure that other adults visit the room occasionally
- avoid working in isolation with children unless thought has been given to safeguards.
- do not give out personal mobile phone numbers or private e-mail addresses
- do not give pupils lifts home in your cars without another adult being present
- do not arrange to meet them outside of school hours
- do not chat to pupils on social websites

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of physical force or restraint against pupils will be carried out and documented in accordance with the relevant physical restraint policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed. Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment. (See Staff Handbook/Code of Conduct)

Infatuations and Crushes

Adults must recognise that a pupil may be strongly attracted to a member of staff or volunteer and/or develop a heterosexual or homosexual infatuation. A member of staff or volunteer, who becomes aware that a pupil may be infatuated with him/herself or a colleague, must report this without delay to a senior colleague so that appropriate action can be taken. The situation will be taken seriously and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations. Whilst the risk of infatuation is not limited to younger members of staff, newly qualified teachers must recognise their particular vulnerability to adolescent infatuation.

Seeking advice in circumstances where concerns arise. Examples of situations which must be reported are given below:

- Where a member of staff or volunteer is concerned that he or she might be developing a relationship with a pupil which could have the potential to represent an abuse of trust.
- Where a member of staff or volunteer is concerned that a pupil is becoming attracted to him or her, or that there is a developing attachment or dependency.
- Where a member of staff or volunteer is concerned that actions or words have been misunderstood, or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others.
- Where a member of staff or volunteer is concerned about the apparent development of a relationship by another member of staff or volunteer or receives information about such a relationship.

Gifts

It is against the law for public servants to take bribes. Staff need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment. There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis, or of any significant value.

Personal gifts must not be given to pupils. This could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return. Any

reward given to a pupil should be consistent with the school's behaviour policy, recorded, and not based on favouritism.

Managing Allegations of Abuse against a Professional

Children can be the victims of abuse by those who work with them in any setting. All allegations of abuse of children carried out by any staff member (including supply staff, volunteers and contractors) should therefore be taken seriously and the guidance (KCSIE) will be followed to manage such alleged cases where the member of staff has:

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

If we receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children (this applies regardless of whether or not the children who attend any of these sessions or activities are children on the school roll or attend the school), we will follow our school safeguarding policies and procedures, informing the LADO, as we would with any safeguarding allegation.

Low Level Concerns

The term “low-level” concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds mentioned above. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” - that an adult working in or on behalf of the school may have acted in a way that:

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

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

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

Allegations of abuse made against staff, (including low-level concerns), whether historical or contemporary, should be dealt with by the Head Teacher and the Designated Safeguarding Lead (if the allegation is against the Head then it should be dealt with by the Chair of Governors). The head/chair should contact the Local Authority Designated Officer (LADO) to report the allegation (preferably within 1 hour) using the referral form at the following link : [LADO Referral Form](#)

Procedures for dealing with allegations will include initial considerations that will establish the validity of any allegation. In this case a strategy meeting will be called that the head/chair and designated lead will share all relevant information and discuss the content, context and agreed course of action. The decision of the strategy meeting could be:

- investigation by children’s social care
- police investigation if there is a criminal element to the allegation
- single agency investigation completed by the school which should involve a representative from HR.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken. It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately.

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

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

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

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

The school also has a duty of care for its employees and will act to manage and minimise the inherent stress. Parents and carers of pupils involved will also be informed and made aware of the requirement to maintain confidentiality. A clear and comprehensive summary of the allegation, how it was followed up and resolved and actions taken and made will be recorded. Where the school is not the employer of an individual (e.g. supply teacher or volunteer) it still has the responsibility to ensure allegations are dealt with appropriately and that it liaises with relevant parties, complying with all aspects of the guidance in Part 4 of KCSiE. It is expected that most cases will be resolved within 1 month but no later than 12 months for exceptional cases. If a member of staff offers to resign as a result of an allegation being made, this should not prevent the allegation procedure reaching a conclusion. The possible risk of harm to children will be evaluated and managed and alternatives to suspension may be considered. Specific actions will be followed after a criminal investigation or prosecution, conclusion of a case or unsubstantiated allegations. See also "Managing Safeguarding Allegations Against Staff and Volunteers Who Work With Children and Young People."

If an allegation is made against a governor, the school will follow our own local procedures. Where an allegation is substantiated we will follow procedures to consider removing them from office.

If an allegation received does not require referral under child protection procedures 'Grey Book' procedures will be adhered to by the Head Teacher or Chair of Governors.

It is important that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member.

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

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

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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

- A clear and comprehensive summary of the allegation

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

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Whistleblowing

Any member of staff who is concerned about the conduct of another member of staff (including supply staff and volunteers) or adult on the school premises or has concerns about safeguarding practices within the school should contact either the Designated Safeguarding Lead or the Headteacher, in line with the school's Whistleblowing Policy.

Should your concern relate to the Headteacher, you should contact the Designated Safeguarding Lead, LA Designated Officer or the Chair of Governors.

The NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

A free, confidential employee advice line service (020 3117 2520) is provided by the independent charity "Protect" which offers independent advice to anyone worried about malpractice in the workplace. Further information is available online at <https://protect-advice.org.uk>

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is a reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

Safer Recruitment

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

Interview and selection

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher. School can use the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the DfE's web page. Users will require a DfE Sign-in account to log onto the service. Further information about obtaining a DfE Sign-in account and

using Check a teacher's record to carry out a range of 'teacher status checks' including verification of qualified teacher status (QTS) and the completion of teacher induction or teacher probation can be found on [GOV.UK](https://www.gov.uk).

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

- In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:
- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

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

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.

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 keep a record of such checks for on the school single central record. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

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

Trainee/student teachers

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- 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
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

School should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

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.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Checking the identity and suitability of visitors

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

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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.

Links with Other Policies	
Adults in School	Intimate Care
Anti-Bullying	Managing Safeguarding Allegations Against Staff and Volunteers Who Work With C & YP
Attendance	Off Sites Visits
Behaviour	PHSE
Digital Safeguarding	Physical Restraint & Safer Handling
Domestic Abuse	Safer Recruitment
Equality, Diversion and Cohesion	Staff Handbook/Code of Conduct
First Aid	SEND
Grey Book	Social Media
Health and Safety	Whistleblowing
Health and Wellbeing	

Monitoring policy and practice

Our safeguarding and child protection policy and procedures will be reviewed annually or sooner if required. All staff and stakeholders may contribute to the development of our policies and procedures. Our policy will be published on our website and paper copies are available upon request.