

Child Protection and Safeguarding

GFM Special & Alternative Provision Phase:

LWS Academy

Gateway

EA Academy

SGL

Approved by:

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	LWS: Christopher Berry EA: Vicky Cadwallader-Thorne will Gateway: Ben Beazley	cberry@lws.gfmat.org vc-thornewill@ea.gfmat.org to liaise with host school DSL bbeazley@gateway.gfmat.org to liaise with host school DSL

	SGL: Tam Mitchell	tmitchell@gfmat.org to liaise with host schools and to provide support for colleagues within phase.
GFM Host Schools DSL	Brune Park – Rachel Adderley Bay House – Steve Kitchen	radderley@brunepark.gfm.org skitchen@bayhouse.gfm.org
Deputy DSL	Stuart Tyreman –LWS, EA, Gateway, SGL LWS: Rebecca Lawley Mustafa Sulo Claire Knight Rebecca Gumm Steph Simpson SGL: Tiffany Morris	styreman@gfmat.org rlawley@lws.gfmat.org msulo@gfmat.org cknight@gateway.gfmat.org rgumm@gfmat.org stssimpson@lws.gfmat.org tmorris@gfmat.org
Executive Headteacher for Special & Alternative Provision - GFM	Stuart Tyreman	styreman@gfmat.org
Local authority designated officer (LADO)	Barbara Piddington Fiona Armfield	01962 876364/ 07903 649503 01962 832037/07540 930 259
Chair of governors	Kirsty Robertson	krobertson@global.gfmat.org
Channel helpline		Tel: 020 7340 7264
Multi-Agency Safeguarding Hub (MASH)		Tel: 01329 225379
Police		Tel - 101/999

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

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

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

Hampshire Safeguarding Children Partnership comprises the local authority, the West Hants Clinical Commissioning Group, and Hampshire Constabulary.

Contact details:

Website – www.hampshirescp.org.uk

Email – hscp@hants.gov.uk

Telephone – 01962 876355.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

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

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

Children includes everyone under the age of 18.

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

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

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)

5. Roles and responsibilities

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

5.1 All staff

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

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The Lead DSL for LWS is Christopher Berry (Headteacher), for Gateway – Ben Beazley (Centre Leader), EA – Vicky Cadwallader-Thornewill (Centre Leader), and SGL – Tamara Mitchell (Children and Families Team Leader) The DSLs takes lead responsibility for child protection and wider safeguarding.

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns.

Out of hours each lead DSL is available via email:

LWS – cberry@lws.gfmat.org

EA - vc-thornewill@ea.gfmat.org

Gateway – bbeazley@gateway.gfmat.org

SGL – tmitchell@gfmat.org

If the site centric DSL is not available, the deputy/deputies as detailed in IMPORTANT CONTACTS will act as cover.

When the site centric DSL and the deputy/deputies are not available – available DSLs across the phase as detailed in IMPORTANT CONTACTS will act as cover for example, during out of hours/out of term activities).

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

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

The DSLs will also keep the headteacher and executive headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSLs and deputy/deputies are set out in their job description.

5.3 The governing board

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

The governing board will appoint a senior board level (or equivalent) link governor(s) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSLs.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The executive headteacher and leadership teams:

The executive headteacher and phase leadership team are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if a DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

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

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

However, staff are expected to promote confidentiality within the establishments, and will not share information outside of the provision about students and staff at any time other than for the purpose of safeguarding. The information can only be shared with Children's Services and members of the Hampshire Safeguarding Children partnership members.

LWS - All safeguarding and Child Protection concerns are logged on CPOMS, which then alerts the DSLs via email. Any further records relating to the concern are recorded on CPOMS and additionally saved on a secure internal drive.

Any records passed to the school from prior establishments which are hard copies are kept in a locked filing cabinet in the Leadership office. Keys to this office are only held by members of the Leadership Team.

EA/Gateway/ SGL – All safeguarding and Child Protection concerns are logged on CPOMS, which then alerts the DSLs via email. Host schools are able to download reports from CPOMS to save to their secure internal recording system.

Referrals will only be made in liaison with the host school unless there is an immediate presenting need of danger to the child. In this case, the police and Children's Services must be called without delay.

7. Recognising abuse and taking action

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

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

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Please see Appendix 5.

The following link will allow you to report a concern online immediately.

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

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Record the disclosure on CPOMS as soon as possible, with the correct date and time of the disclosure. Ensure the relevant DSL group is electronically alerted, and always verbally alert the DSL to the disclosure. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

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

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

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

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

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

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

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

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

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

See Figure 1.

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

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

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

Early help

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

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Early Help Hub referrals can only be undertaken with the family's permission.

The Lead coordinator for EHH referrals are as follows:

LWS – Rebecca Lawley/Tutor

Gateway – Ben Beazley/Parent School

EA – Vicky Cadwallader-Thornewill/Parent School

SGL – Children & Families Team if involved/Parent School

Students whose attendance has fallen below 85% and all available school strategies have had no impact can be referred to the GFM Children & Families Team for support. The CAFT will liaise with the parent school regarding when it may be necessary to refer to Tier 3 and 4 support – EHH/Children Services.

Referral

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

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

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

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

Details regarding the escalation and resolution process can be found in the following link.

<http://hipsprocedures.org.uk/assets/clients/7/HIPS-Joint-Working-Protocol-for-the-Professional-Challenge-and-Resolution-of-Professional-Disagreement-May-2019.pdf>

7.5 If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and 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.

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

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

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

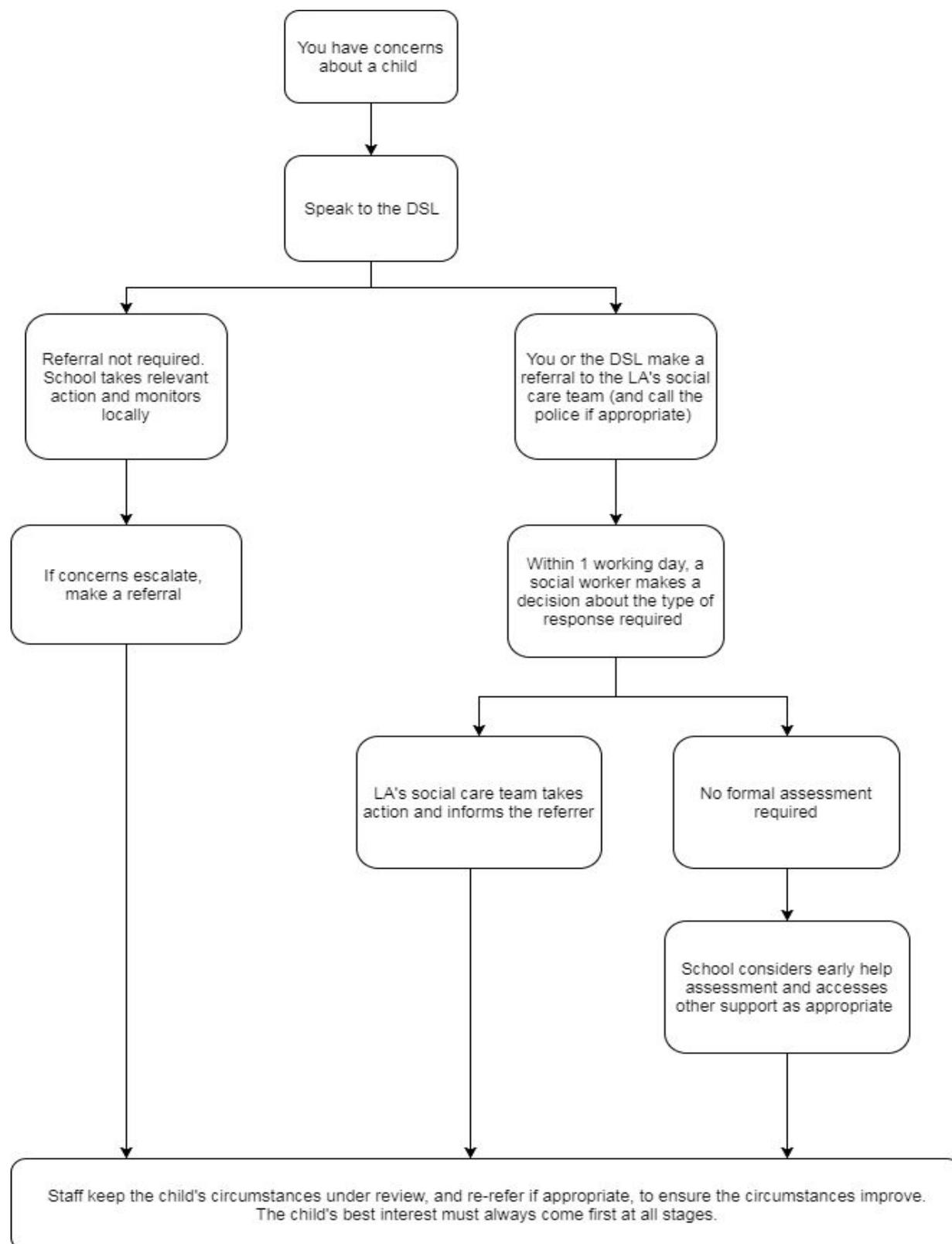
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

The SPAP phase has a Mental Health Lead- Rebecca Gumm who will be able to advise, submit/liaise with CAMHS referrals and provide a level of support for a student who does not have other supporting services in place. She will also support families where possible in accessing mental health appointments.

The Mental Health Lead role is directly accountable to the leadership teams of the phase.

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

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



7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors – Kirsty Robertson.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

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

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially or email from their school email accounts to staff email accounts.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

7.9 Sexting

Your responsibilities when responding to an incident

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

You must **not**:

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

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

Initial review meeting

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

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

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

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

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

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

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

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8. Notifying parents

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

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

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

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

9. Pupils with special educational needs and disabilities

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

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

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

FEIPS/Mental Health support, pastoral based tutor.

All the students at LWS have Education, Health and Care Plan (EHCP) with their primary need identified as social, emotional and mental health difficulties. All students have access to support as identified in their EHCPs. All staff are supported by an independent Psychotherapist to deliver a whole service trauma informed approach.

10. Pupils with a social worker

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

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

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

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

11. Looked-after and previously looked-after children

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

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

We have appointed designated staff at LWS, Gateway and EA:

LWS: Rebecca Lawley – Assistant Headteacher, Mustafa Sulo – Assistant Headteacher, and Steph Simpson, Teacher;

Gateway: Ben Beazley/Parent school;

EA: Vicky Cadwallader-Thornewill/Parent School;

who are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated staff are appropriately trained and have the relevant qualifications and experience to perform the role.

As part of their role, the designated staff will:

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

12. Mobile phones and cameras

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

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

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

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

All safeguarding related complaints including those related to premises should be directed to the relevant leadership team:

LWS – Chris Berry (Headteacher), Mustafa Sulo or Rebecca Lawley (Assistant Headteachers);

Gateway: Ben Beazley

EA: Vicky Cadwallader-Thornewill

SGL: Tamara Mitchell

Executive Headteacher: Stuart Tyreman

13.3 Whistle-blowing

Please refer to the Whistle-blowing policy.

https://docs.google.com/document/d/1PAEv5OUJZ3LGpWlpCCmtQLNTU4ak_tBPDC_ID3Em-CY/edit#heading=h.gjdgxs

14. Record-keeping

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

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

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSLs will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSLs will speak to the DSLs 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.

All records relating to safeguarding are primarily stored electronically via CPOMS and in a separate secure electronic file. At LWS any paper-based files from previous settings are stored in a locked filing cabinet in the Leadership office. Only the Headteacher has the key for the filing cabinet.

The information is retained for 9 years post statutory school leaving age, or passed to the next educational establishment if leaving before statutory leaving age. If the receiving the school operates CPOMS, the student file is passed electronically secure via CPOMS.

Information is shared with partner agencies only when requested and if in the best interests of the child. For all Child Protection procedures including ICPC/RCPC reports are downloaded from CPOMS.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

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

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

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

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

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Governors

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

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

15.4 Recruitment – interview panels

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

15.5 Staff who have contact with pupils and families

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

16. Monitoring arrangements

This policy will be reviewed **annually** by the SPAP phase leadership teams. At every review, it will be approved by the full governing board.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle-blowing
- Acceptable use
- Anti-bullying

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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

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

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

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

Regulated activity means a person who will be:

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

Existing staff

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

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

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

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

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

Volunteers

We will:

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

Governors

All trustees, local governors and members 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).

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

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

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

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

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

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

Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

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

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 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 GFMAT

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
- **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 headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible the governing board and academy trust 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 staff

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

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

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

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

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension

- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Appendix 4: specific safeguarding issues

Children missing from education

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

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

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

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

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

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

Child sexual exploitation

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

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

Domestic abuse

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#)

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, such as the SMSC and Curriculum policies.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. All visitors' mobile phones are to be kept in their bags or packets and not to be used in the school during the course of their visit, and to leave their belongings, including their mobile phone(s), in a safe place during their visit. It is forbidden for any visitor to be using any device to record within the school or around the grounds. This includes mobile phones.

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 the visitors' book and wear a visitor's badge.

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

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

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

Missing pupils

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

Refer to the Missing Students policy

<https://docs.google.com/document/d/1qfxXQY1ddNbaV0jmV9Lwg-qlh5MDkKym3jmeaOeFhi0/edit>

Appendix 5:

Special and Alternative Provision Phase Child Protection Procedures

The following procedures apply to all staff working in the phase and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a student is being harmed or is at risk of harm.

The prime concern at all stages must be the interests and safety of the student. Where there is a conflict of interest between the child and an adult, the interests of the student must be paramount.

All staff are aware that very young children with those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally staff will question the cause of knocks and bumps in students who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information

439393048. Report it to the DSL immediately

439393552. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available (see point 8 below)

439393104. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:

- Dates and times of their observations
- Dates and times of any discussions in which they were involved.
- Any injuries
- Explanations given by the child / adult
- What action was taken
- Any actual words or phrases used by the student

The records must be signed and dated by the author or / equivalent on electronic based records – CPOMs (LWS) Host Schools' processes – EA/Gateway

439392824. In the absence of the DSL or their Deputies, be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate significant harm

Following a report of concerns the DSL must:

1. Decide whether or not there are sufficient grounds for suspecting significant harm in which case a referral must be made to Children's Social Care and the police if it is appropriate

439393216. Normally the school should try to discuss any concerns about a student's welfare with the family and where possible to seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. The student's views should also be taken into account.

439393272. If there are grounds to suspect a student is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via the Inter-Agency Referral Form (IARF) making a clear statement of:

- the known facts
- any suspicions or allegations
- whether or not there has been any contact with the student's family

If there is indication that the student is suffering significant harm, a call will also be made to Children's Reception Team (CRT) on 01329 225379.

If the child is in immediate danger, the police will be contacted on 999.

439392096. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help process

439392768. The DSL must confirm any referrals in writing to Children's Social Care, within 24 hours, including the actions that have been taken. The written referral must be made using the Inter-Agency Referral Form (IARF) which will provide Children's Social Care with the supplementary information required about the student and family's circumstances. (IARF can be accessed at the following page <https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/contacts>)

439393496. If a student is in immediate danger and urgent protective action is required, the police must be called. The DSL must also notify Children's Social Care of the occurrence and what action has been taken

439393608. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.

439392264. When a student is in need of *urgent* medical attention and there is suspicion of abuse the DSL or their Deputy should take the student to the accident and emergency unit at the nearest hospital, having first notified Children's Social Care. The DSL should seek advice about what action Children's Social Care will take and about informing the parents, remembering that parents should normally be informed that a student requires urgent hospital attention.

Appendix 6:

Child protection and safeguarding: COVID-19 addendum

GFM Special Phase & Alternative Provision

LWS Academy

EA

Gateway

SGL

September 2020

To be reviewed - Ongoing

Contents

Important contacts

1. Scope and definitions
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10. Safeguarding for children not attending school
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14. Children attending other settings
15. Monitoring arrangements
16. Links with other policies

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	<p>LWS: Christopher Berry</p> <p>EA: Vicky Cadwallader-Thornewill</p> <p>Gateway: Ben Beazley</p> <p>SGL: Tam Mitchell</p>	<p>cberry@lws.gfmat.org</p> <p>vc-thornewill@ea.gfmat.org to liaise with host school DSL</p> <p>bbeazley@gateway.gfmat.org to liaise with host school DSL</p> <p>tmitchell@lws.gfmat.org</p>
GFM Host Schools DSL	<p>Brune Park – Rachel Adderley</p> <p>Bay House – Steve Kitchen</p>	<p>radderley@brunepark.gfm.org</p> <p>skitchen@bayhouse.gfm.org</p>
Deputy DSL	<p>Stuart Tyreman –LWS, EA & Gateway</p> <p>LWS:</p> <p>Rebecca Lawley</p> <p>Claire Knight</p> <p>Rebecca Gumm</p> <p>Steph Simpson</p> <p>SGL</p> <p>Tiffany Morris</p>	<p>styreman@lws.gfmat.org</p> <p>rlawley@lws.gfmat.org</p> <p>cknight@gateway.gfmat.org</p> <p>rgumm@gateway.gfmat.org</p> <p>stsimpson@lws.gfmat.org</p> <p>tmorris@lws.gfmat.org</p>
Executive Headteacher for Special & Alternative Provision - GFM	Stuart Tyreman	styreman@lws.gfmat.org
Local authority designated officer (LADO)	Barbara Piddington Fiona Armfield	<p>Barbara.Piddington@hants.gov.uk</p> <p>Fiona.Armfield@hants.gov.uk</p>
Chair of governors	Kirsty Robertson	krobertson@global.gfmat.org
Channel helpline		Tel: 020 7340 7264
Multi-Agency Safeguarding Hub (MASH)		Tel: 01329 225379

Police		Tel - 101/999
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1. Scope and definitions

This addendum applies during a period of school closure due to COVID-19, and reflects updated advice from our 3 local safeguarding partners, and local authority (LA) Hampshire. It sets out changes to our normal child protection policy in light of the Department for Education's guidance [Coronavirus: safeguarding in schools, colleges and other providers](#), and should be read in conjunction with that policy.

Unless covered here, our normal child protection policy continues to apply.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:

Have a social worker, including children:

- With a child protection plan
- Assessed as being in need
- Looked after by the local authority

Have an education, health and care (EHC) plan

2. Core safeguarding principles

We will still have regard to the statutory safeguarding guidance, [Keeping Children Safe in Education](#).

Although we are operating in a different way to normal, we are still following these important safeguarding principles:

- The best interests of children must come first
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- A designated safeguarding lead (DSL) or deputy should be available at all times (see section 4 for details of our arrangements)
- It's essential that unsuitable people don't enter the school workforce or gain access to children
- Children should continue to be protected when they are online

3. Reporting concerns

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this.

Information has been shared in the daily welfare check in guide. Concerns to be shared with line manager, who will then discuss with DSLs on duty. All concerns to be recorded on CPOMS and DSLs alerted to them as per usual process.

As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

4. DSL (and deputy) arrangements

We aim to have a minimum of 1 trained DSL or deputy DSL on sites in the phase wherever possible. Details of all important contacts are listed in the 'Important contacts' section at the start of this addendum. In addition there will be 2 additional trained DSLs available as per the staffing rota each day who can be contacted via email.

We will keep all school staff and volunteers informed by email/ and the digital staff notice board as to who will be the DSL (or deputy) on any given day, and how to contact them.

We will ensure that DSLs (and deputies), wherever their location, know who the most vulnerable children in our school are.

In the case of severe illness/self isolation, where there is no DSL or deputy on site, a senior leader will take responsibility for co-ordinating safeguarding. This will be Tamara Mitchell/Stuart Tyreman. You can contact them by: email as per the details above.

The senior leader will be responsible for liaising with the off-site DSL (or deputy) to make sure they (the senior leader) can:

Identify the most vulnerable children in school

Update and manage access to child protection files, where necessary

Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessments.

5. Working with other agencies

We will continue to work with children's social care, and with virtual school heads for looked-after and previously looked-after children.

We will continue to update this addendum where necessary, to reflect any updated guidance from:

Our 3 local safeguarding partners Hampshire Children's Services, NHS Southern, and Hampshire Constabulary.

The local authority about children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need

The following guidance is currently in place:

HCC SEN - where student's EHCP needs could be met safely at home they should remain at home. If they have medical or personal care needs which require additional support, arrangements should be made where possible for support to be at home. Students should only attend special provision if there is no risk to their health.

EHCPs can be postponed during this period, however if all parties have the means to do so, a virtual meeting could be arranged. This also applies to PEP meeting procedures.

Health - CAMHS appointments will be held by telephone/video call where possible.

Children's Services contact with vulnerable students will be remote where possible. All meetings will be held virtually.

6. Monitoring attendance

As most children will not be attending school during a period of school closure, we will not be completing our usual attendance registers or following our usual procedures to follow up on non-attendance.

The exception to this is where any child we expect to attend school during the closure doesn't attend, or stops attending. In these cases we will:

- Follow up on their absence with their parents or carers, by contacting by telephone/email/text on a daily basis until contact is made. In rare situations it may be necessary for school staff to make a cold call to the home (practising safe social distancing measures), if there is prolonged non-contact.
- Notify their social worker, where they have one
- We are using the Department for Education's daily online attendance form to keep an accurate record of who is attending school.
- We will make arrangements with parents and carers to make sure we have up-to-date emergency contact details, and additional contact details where possible.

We will attempt to contact every family and student via telephone a minimum of 3 times per week, and all vulnerable students daily. All contact is logged on internal school systems.

7. Peer-on-peer abuse

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse. Staff should continue to act on any concerns they have immediately.

8. Concerns about a staff member or volunteer

We will continue to follow the principles set out in part 4 of Keeping Children Safe in Education.

Staff should continue to act on any concerns they have immediately.

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this using the email address Misconduct.Teacher@education.gov.uk for the duration of the COVID-19 period, in line with government guidance.

9. Support for children who aren't 'vulnerable' but where we have concerns

We have the option to offer places in school to children who don't meet the Department for Education's definition of 'vulnerable', but who we have safeguarding concerns about. We will work with parents/carers to do this. If these children will not be attending school, we will put a contact plan in place, as explained in section 10.1 below.

10. Safeguarding for children not attending school

10.1 Contact plans

We have contact plans for all students, with higher expectations for students with a social worker and students who we have safeguarding concerns about, for circumstances where: They won't be attending school (for example where the school, parent/carer and social worker, if relevant, have decided together that this wouldn't be in the child's best interests); or

They would usually attend but have to self-isolate

These plans set out:

- How often the school will make contact
- Which staff member(s) will make contact
- How they will make contact
- All information is logged on Tutor tracker and CPOMs if necessary.

Please see Communication/Safeguarding Expectations during COVID-19 period.

10.2 Safeguarding all children

Staff and volunteers are aware that this difficult time potentially puts all children at greater risk.

Staff and volunteers will continue to be alert to any signs of abuse, or effects on pupils' mental health that are also safeguarding concerns, and act on concerns immediately. In particular, children are likely to be spending more time online (see section 11 below).

11. Online safety

11.1 In school

We will continue to have appropriate filtering and monitoring systems in place in school.

11.2 Outside school

Where staff are interacting with children online, they will continue to follow our existing staff behaviour policy/code of conduct/IT acceptable use policy.

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 3 of this addendum.

We will make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

11.3 Working with parents and carers

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online

This will be shared by email/texts/daily welfare checkins and digital student notice board.

12. Mental health

Where possible, we will continue to offer our current support for pupil mental health for all pupils. The school counsellor will be available via her school email rgumm@lws.gfmat.org, and will make regular contact with those students already receiving support from her. She will also be providing regular information on the digital student notice board.

We will also signpost all pupils, parents and staff to other resources to support good mental health at this time.

When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.

13.1 Recruiting new staff and volunteers

We continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in our school are safe to work with children.

We will continue to follow our safer recruitment procedures, and part 3 of Keeping Children Safe in Education.

In urgent cases, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at our school.

We will continue to do our usual checks on new volunteers, and do risk assessments to decide whether volunteers who aren't in regulated activity should have an enhanced DBS check, in accordance with paragraphs 167-172 of Keeping Children Safe in Education.

13.2 Staff 'on loan' from other schools

We will assess the risks of staff 'on loan' working in our school, and seek assurance from the 'loaning' school that staff have had the appropriate checks. Where possible, 'loaned staff' will come from within the GFM. This will ensure all relevant safer recruitment checks have already been completed by GFM HR.

We will also use the DBS Update Service, where these staff have signed up to it, to check for any new information.

13.3 Safeguarding induction and training

We will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

New staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of our children protection policy (and this addendum)
- Keeping Children Safe in Education part 1
- We will decide on a case-by-case basis what level of safeguarding induction staff 'on loan' need. In most cases, this will be:
 - A copy of our child protection policy and this addendum
 - Confirmation of local processes
 - Confirmation of DSL arrangements

13.4 Keeping records of who's on site

We will keep a record of which staff and volunteers are on site each day, and that appropriate checks have been carried out for them.

We will continue to keep our single central record up to date.

We will use the single central record to log:

Details of any risk assessments carried out on staff and volunteers on loan from elsewhere
DBS checks and personal details

We will keep an internal log of who is on site each day.

14. Children attending other settings

Where children are temporarily required to attend another setting, we will make sure the receiving school is provided with any relevant welfare and child protection information. Wherever possible, our DSL (or deputy) will share, as applicable:

- The reason(s) why the child is considered vulnerable and any arrangements in place to support them
- The child's EHC plan, child in need plan, child protection plan or personal education plan
- Details of the child's social worker
- Details of the virtual school head

Where the DSL, deputy or SENCO can't share this information, the senior leader(s) identified in section 4 will do this.

We will share this information before the child arrives as far as is possible, and otherwise as soon as possible afterwards. 13.4 Keeping records of who's on site

We will keep a record of which staff and volunteers are on site each day, and that appropriate checks have been carried out for them.

We will continue to keep our single central record up to date.

[Change this paragraph if you're going to use a different way of logging who's in school each day.] We will use the single central record to log:

Everyone working or volunteering in our school each day, including staff 'on loan'

Details of any risk assessments carried out on staff and volunteers on loan from elsewhere

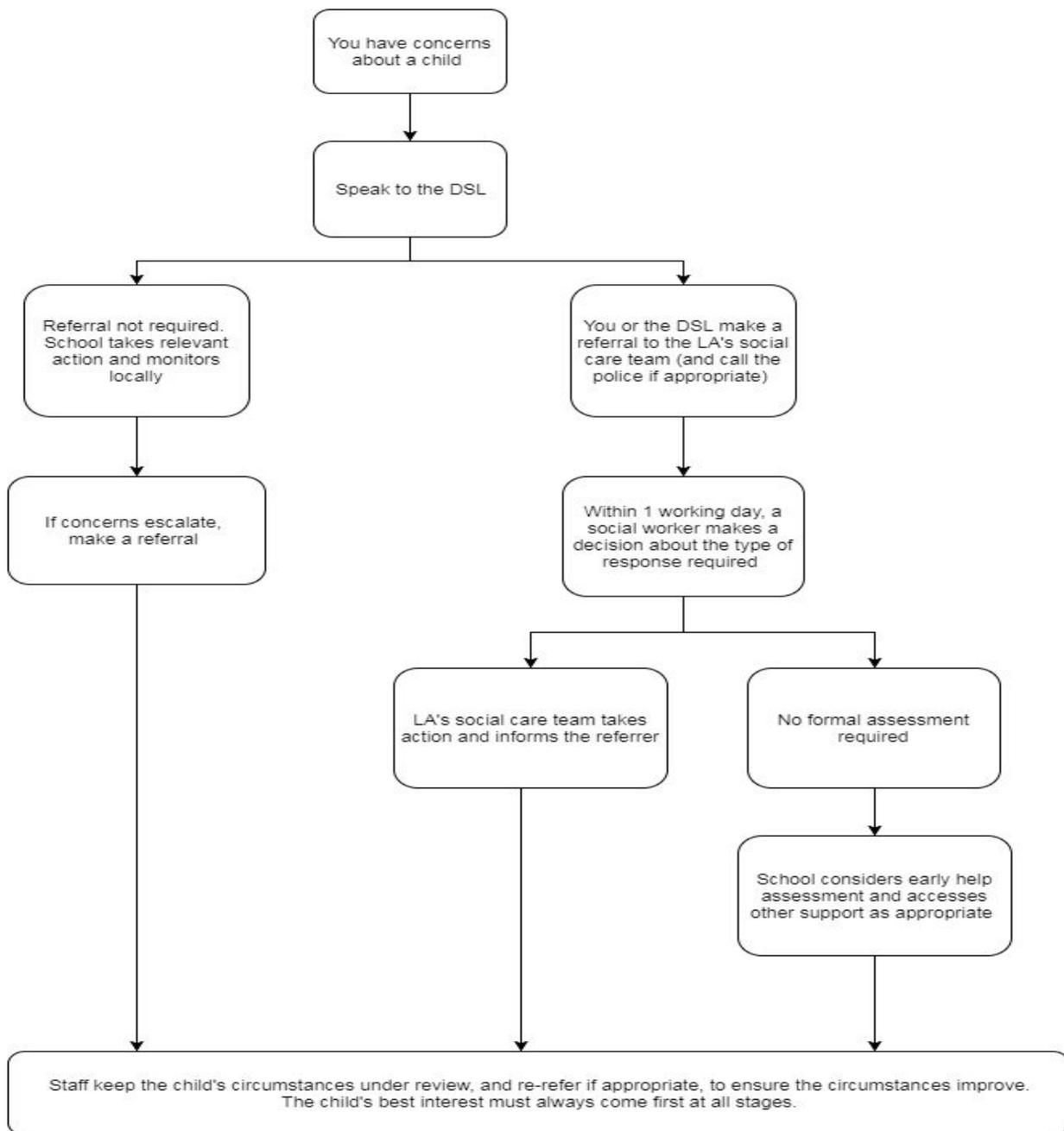
15. Monitoring arrangements

This policy will be reviewed as guidance from the 3 local safeguarding partners, the LA or DfE is updated, by Tamara Mitchell - Lead DSL. At every review, it will be approved by the full governing board.

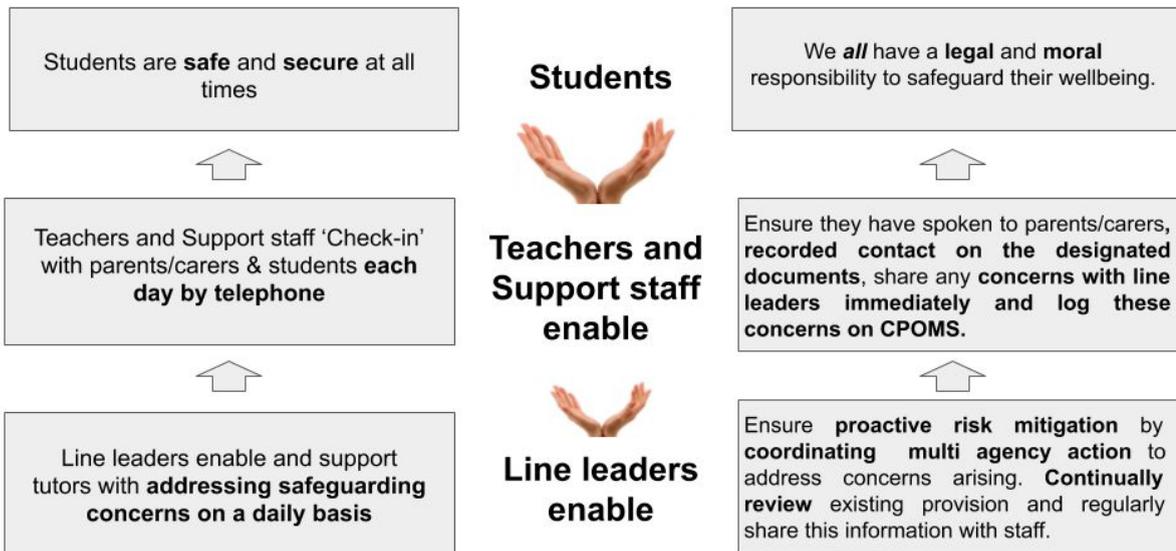
16. Links with other policies

This policy links to the following policies and procedures:

- Communication/Safeguarding procedures during COVID 19 Period
- Child protection policy
- Staff [behaviour policy/code of conduct]
- IT acceptable use policy
- Health and safety policy
- Online safety policy



Safeguarding Students during CV-19



In usual circumstances, our ability to provide safeguarding supervision is enabled by the daily attendance of students. In cases of absence we follow the absence policy which requires first day absence communication with families, and this escalates if attendance does not improve. This is supported by processes such as the legal attendance process, and referrals to Childrens' Services when there has been no communication in any form from any member of the family over a prolonged period.

None of this is available to us now, and our roles in education are now primarily focused on ensuring the wellbeing of students and families including safeguarding needs. Challenging with social distancing and families who may struggle to engage with support and communication. The safeguarding risks for our students have potentially increased significantly with current government limitations of social distancing, but our ability/toolbox to monitor has decreased.

As we are unable to see students' welfare on a daily basis, we need to make arrangements to have daily communication with them in some form. This includes all students on part-time timetables/alternative provision. This applies to both families and students. Students are rated according to their vulnerability as defined by the recent Government legislation:

All students with a social worker:

A minimum expectation is that you attempt verbal contact everyday with these students/families regardless of their usual attendance pattern. If no contact is made, a follow up text/email is sent. If

continued non-contact please discuss with leadership members who will advise accordingly. For those students in **residential care homes**, discussion may be had with the home about the agreed acceptable level of contact. This will need to be agreed by an SLT member before finalising, and recorded for the student.

All students with a social worker will be allocated to the DSLs in the phase to continue the communication over the Easter period +1 week post break. This will be reviewed in line with Government guidance updates. More details will be released over the coming days.

All EHCP students:

Where possible, attempt verbal contact by telephone every day. For those families/students who find this difficult, alternative arrangements could be discussed whereby there are phone calls on Mon, Wed, Fri and email/text contact on Tues, Thurs.

No more than three days should pass without attempts at verbal communication with families/students. As previously mentioned, all alternative agreed plans should be discussed with an SLT member for agreement before being finalised with parents.

If possible, obtain student phone numbers and phone/ text them directly as well as parents. All students have a GFM email, please feel free to use this to encourage communication, ie., an agreed time for a phone call as discussed via email/text.

We can use Arbor to send texts (to protect personal mobile phones) and emails. This will record all communication to ensure both students and staff are safeguarded.

All communication/attempts should be logged on your trackers. This enables senior leaders to identify ongoing concerns, and have evidence to support referrals.

If at any point in your communication you have concerns/prolonged non contacts, please discuss with your line manager who will then potentially speak to the Senior Leader on duty, and if any further doubts then be discuss these with the lead DSL. This discussion could be supported via a 'Hang Out' meeting - to try and replicate those all important discussions we would usually have at school in order to come to the appropriate action.

We appreciate this may be more contact than families may be used to in usual circumstances, but the wellbeing of the students is paramount at all times.

Helpful scripts:

Checking the whole family is well - guidance over self isolation if necessary.

Possible support which could be offered/signposted - food parcels, mental health, food/medicine deliveries etc

Being an ear for them to offload to - we know how challenging it can be to have some students in school - imagine being with them for 24 hours a day ongoing. This goes both ways - challenging for students.

Safeguarding

All information to be shared via CPOMS alerting DSLs.

When considering safeguarding concerns, remember to think what is the actual risk?

All services are working as remotely as possible at present and Children's Services is only providing an emergency service for those children at risk of immediate harm.

Things to consider:

- is there a known history of risk of immediate harm? If yes, what is the harm.
- Perspective of current national situation and how this may affect families including mental health, willingness to engage, receive cold calls, telephone calls. Some families may want to withdraw completely. How do we manage this as there are now formal expectations on families to engage, i.e. ALP.
- What are you seeking as an outcome of any potential referrals?
- Is there more that LWS could do, ie., not just passing something to another agency because our usual process hasn't worked initially.

Let's make a conscious effort to support each other by attempting to replicate those vital discussions used in school usually that help with our collective thinking. In turn this will also help our families to ensure they are not feeling 'policed', and therefore willing to continue to engage.

Every day there will be a minimum of 3 DSLs on duty across the phase.