RAYLEIGH SCHOOLS TRUST

CHILD PROTECTION AND SAFEGUARDING POLICY

Prepared in Consultation with:	**Sweyne Park School LGB**
Approved by:	
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Important Contacts:

The Sweyne Park School:

ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL): Sweyne Park / MAT	Richard Bradley	rbradley@sweynepark.com 01268 784721
Headteacher/CEO	Katharine Dines	admin@sweynepark.com 01268 784721
Deputy Designated Safeguarding Leads	Vanessa Brend John Edwards Alick Robertson Adam Thomson Steph Woodward Dawn Pearman	vbrend@sweynepark.com jedwards@sweynepark.com arobertson@sweynepark.com athomson@sweynepark.com swoodward@sweynepark.com dpearman@sweynepark.com 01268 784721
Designated Safeguarding Governor	Jacqui Clements	admin@sweynepark.com 01268 784721
Chair of Governors	Lynda Walker	admin@sweynepark.com 01268 784721

Glebe Primary School:

ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Martyn Clarke	admin@glebeschool.com 01268 784253
Headteacher	Martyn Clarke	admin@glebeschool.com 01268 784253
Deputy Designated Safeguarding Leads (DDSL)	Helen Coote Michaela Hembling Shelley Parker	admin@glebeschool.com 01268 784253
Designated Safeguarding Governor	Katie Brian	admin@glebeschool.com 01268 784253
Chair of Governors	Steve Munford	admin@glebeschool.com 01268 784253

1: Introduction

Schools and their staff are an important part of the wider system of safeguarding for children. Safeguarding and promoting the wellbeing of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure that their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

(*Keeping Children Safe in Education* – DFE, 2023)

This safeguarding and child protection policy is for all staff, parents / carers, Governors, trustees and the wider school community. It forms part of the safeguarding arrangements for the schools in our Trust and should be read in conjunction with the following:

- The Behaviour Policies Sweyne Park School and Glebe Primary School
- The Staff Codes of Conduct for Sweyne Park School and Glebe Primary School

The schools in our trust share an ethos of respect and putting the individual child at the centre of school life and decision-making. We are committed to safeguarding children, and we expect everyone who works in our schools to share this commitment. Adults in our schools take all welfare concerns seriously and encourage children to talk to us about anything that worries them. Each of the schools in our trust have a whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything that we do, and underpins all systems, processes and policies. It is important that our values are understood and shared by all children, staff, parents/ carers, Governors, trustees and the wider school community. It is only by working in partnership, can we effectively keep children safe. We will always act in the best interests of the child.

2: Aims

The schools in the Rayleigh School Trust aim to ensure that:

- We establish a safe environment in which are pupils feel secure, where they are encouraged to talk and are listened to seriously, and in which they are able to learn and thrive.
- Children know that they can speak to any adult in school if they are in difficulty or concerned about one of their peers.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- Vulnerable children, and those in difficult circumstances, are identified and supported; those children who have been abused are supported in accordance with their agreed plans.
- All staff are aware if their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- We practise safe recruitment in checking the suitability of staff and volunteers to work with the children in our schools.
- We raise children's awareness of child protection issues and equip children with the skills they need to keep themselves safe.
- Staff will be encouraged to challenge and 'think the unthinkable'.

3: Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance **Keeping Children Safe in Education (2023)** 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 statutory safeguarding partners. In Essex, the statutory safeguarding partners are Essex County Council, Essex Police and five of the seven integrated care boards (previously known as Clinical Commissioning Groups) covering the county. Working Together to Safeguard Children places a shared and equal duty on the three safeguarding partners to work together to safeguard and promote the

welfare of all children in their area under multi-agency safeguarding arrangements. These arrangements sit under the Essex Safeguarding Children Board (ESCB). In Essex, all professionals must work in accordance with the SET Procedures.
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 to safeguard and promote the welfare of pupils at the school.
- The Children's 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 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.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means that our trustees, Governors, CEO and Headteachers / leadership teams should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows schools in our Trust to take positive action to deal with particular disadvantages affecting these pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern, and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and the Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

The schools in our Trust also work in according with the following guidance (this is not an exhaustive list):

- Essex Effective Support
- Children Missing Education – statutory guidance for local authorities (DFE, 2016)
- Information Sharing advice for safeguarding practitioners (HMG, 2018)
- What to do if you're worried a child is being abused (HMG, 2015)
- Searching, Screening and Confiscation – Advice for schools (DFE, 2022)
- Preventing and Tackling Bullying (DFE, 2017)

- Promoting Positive Emotional Wellbeing and Reducing the risk of suicide (ESCB, 2018)
- Preventing Youth Violence and Gang involvement (Home Office, 2015)
- Criminal Exploitation of Children and Vulnerable Adults – county lines guidance (Home Office, 2018)
- Teaching Online Safety in Schools (DFE, 2019)
- Education Access Team CME / Home Education policy and practice (ECC, 2018)
- Understanding and Supporting Behaviour – good practice for schools (ECC, 2021)

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

4: Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and 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.

Sharing nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
Children includes everyone under the age of 18[1].

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

5: Equality statement

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

We give special consideration to children who:

[1] It should be noted that this policy applies to all who are on roll as pupils / students in schools within Rayleigh Schools Trust, including those who are aged 18 and over.

- Have special educational needs or disabilities (SEND) or health conditions (see section 12.1).
- Are young carers (see section 12.4).
- May experience discrimination owing 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 their own or a family member's mental health issues.
- Are looked after or previously looked after (see section 12.3).
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent / carer has expressed an intention to remove them from school to be home educated.

6: Roles and responsibilities

Safeguarding children is **everyone's** responsibility. Therefore, all adults working with or on behalf of children have a responsibility to protect them and provide a safe environment in which they can learn and achieve their full potential. The following are expectations of different groups within Rayleigh Schools Trust.

6.1: All staff

All staff will:

- Read and understand part 1 and Annex B Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Behave in accordance with our Staff Conduct Policy (which is given to all staff annually).
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites that they need to visit or who they will be interacting with online).
- Provide a safe space to any pupil to speak to them and share their concerns about themselves or someone else.
- Be mindful that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- Wear their identification badge, which includes emergency numbers on the reverse.
- Comply with the signing in requirements of the site security system in their school.
- Ensure that pupils respond to the emergency bell system.
- Ensure appropriate use of social media, which includes no contact with pupils or parents/carers.
- Ensure that mobile phones are only used in pupil areas in an emergency or if staff are on duty.

All staff will be aware of:

- Our systems which support safeguarding, including this safeguarding and child protection policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies; the behaviour policy; the online safety policy and the safeguarding response to children who go missing from education.
- The early help assessment process and their role in it, including identifying emerging concerns, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

- The process for making referrals to 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 that they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Their statutory duty personally to inform the police of any reported incident of FGM (see section 8.7), if they are a teacher.
- The signs of different types of abuse, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and will be supported and kept safe.
- The act that children can be at risk of harm inside and outside their home, at school and online.
- That children who are (or who are perceived to be) LGBTQ+ can be targeted by other children.
- What to look for to identify children who need help or protection.

If staff have any concerns about a child's welfare, they must act on them immediately and speak with a member of the safeguarding team and/or make a report on My Concern – they do not assume that others have taken action. Staff are expected to show **professional curiosity** and act upon anything that might be a concern.

Section 8 and appendices 5 and 6 of this policy outline in more detail how staff are supported to do this.

6.2: The Designated Safeguarding Lead (DSL) and Deputies

The DSL in each school in the Rayleigh Schools Trust is a member of the senior leadership team in that school. The DSL at Sweyne Park School and for the MAT is Richard Bradley. The DSL at Glebe Primary School is Michaela Hembling. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours, the DSL can be contacted by school email. When the DSL is for any reason unavailable, the deputy designated safeguarding leads will act in their absence. The DDSLs are trained to the same standard as the DSL.

The DSL in each school 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 in a timely manner (e.g., children's social care, Disclosure and Barring Service, Channel programme, police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Ensure that everyone in school (including temporary staff, volunteers and contractors) are aware of the school's safeguarding policies and procedures and that they are followed at all times.
- Monitor the effectiveness of the school's safeguarding policies and procedures and update the policy as appropriate, at least annually.
- Ensure that the DSL and DDSLs have received the appropriate Level 3 training every 2 years and attend safeguarding briefings organised by the Head of Education Safeguarding (ECC).

- Ensure that staff have attended a Level 2 safeguarding training on an annual basis, and that all staff have read and understood Part 1 of KCSIE. The DSL will also provide regular updates through staff meetings and bulletin.
- Ensure that child protection information is transferred to the new school when a pupil leaves.
- Have a good understanding of the filtering and monitoring systems and processes in place at the school.

The DSL will also:

- Keep the Headteacher informed of any issues, and liaise with the other members of the Leadership Team and Governing Body as appropriate.
- Liaise with the local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Ensure that pupils are taught, as part of a broad and balanced curriculum, the importance of safeguarding, including online safety.
- Be aware of pupils who have a social worker.
- Help promote educational outcomes by sharing information about welfare, safeguarding and child protection information with school staff as appropriate.

6.3: The Headteacher/CEO

The CEO/Headteachers work in accordance with all statutory requirements in safeguarding and are responsible for ensuring that safeguarding policies and procedures adopted by the Trustees and Local Governing Bodies are followed by all staff.

The Headteachers of each school in the Rayleigh Schools Trust are responsible for the implementation of this policy including:

- Ensuring that all staff:
  - are informed of our systems which support safeguarding, including this policy, as part of their induction.
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents / carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.
- Acting as the 'case manager' is the event that there is an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3).
- Making decisions regarding all low-level concerns, collaborating with the Deputy Headteacher(s) and DSL.

The Headteacher of Glebe Primary School is additionally responsible for:

- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure that each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

6.4: The Local Governing Bodies (LGBs)

The LGBs ensure that that the policies, procedures and training in each school in the Rayleigh Schools Trust are effective and comply with the law.

The LGBs will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review (at least annually), ensuring it complies with the law, and hold the Headteacher to account for its implementation.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the SET procedures.
- Appoint a Link Governor to monitor the effectiveness of this policy in conjunction with the full LGB. This Governor takes strategic responsibility at LGB level for safeguarding arrangements in the school. This will always be a different person from the DSL for the school or MAT. The Link Governor will:
  - Maintain regular contact with the school's DSL or deputy
  - Maintain awareness of their current responsibilities and the requirements in relation to child protection by attending appropriate professional development activities.
  - Undertake Level 3 safeguarding training, refreshed every 2 years.
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, training, funding, resources, and support.
  - Online safety is a running and interrelated theme within the whole school approach to safeguarding and related policies.
  - That the DSL has lead responsibility for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
  - That the school has appropriate filtering and monitoring systems in place, and reviews their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
    - Reviewing the DFE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
  - That the school contributes to inter-agency working, in line with statutory and local guidance. The LGB also ensures that information is shared and stored appropriately and in line with statutory requirements.
  - All adults in our school undergo safeguarding and child protection training at induction where appropriate and that it is regularly updated.
  - The school follows recruitment procedures that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place. (See the schools' Safer Recruitment Policy for further information.)
  - Volunteers and contractors are appropriately supervised in school.
  - All staff receive regular safeguarding and child protection training, at least annually, including online safety, to provide them with the relevant skills and knowledge to keep our children safe.
  - Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum.

- The Leadership Team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- The school has procedures in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.

- Where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services /activities are children on the school roll):
  - Seek written assurances that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
  - Make sure that there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The 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 in its entirety.

Section 15.3 of this policy has information on how Governors are supported to fulfil their role.

6.5: Virtual School Heads

Virtual School Heads have non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g., DSLs, SENDCos, social workers, mental health leads, and others.

7: Confidentiality and Information Sharing

7.1: Information Sharing

Timely sharing of information is essential to effective safeguarding, as where there are concerns about the safety of a child, the timely and effective sharing of information between organisations can reduce the risk of harm.

- Fears about sharing information must not be allowed to stand in the way of the needs to promote the welfare, and protect the safety, of children.
- While the Data Protection Act (DPA) 2018 and United Kingdom GDPR place duties on organisations and individuals to process personal information fairly and lawfully, they do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- Similarly, human rights concerns, such as respecting the right to a private and family life, would not prevent sharing information where there are safeguarding concerns.
- If staff need to share 'special category personal data', the DPA 2-18 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 reasonably be expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Generic data flows related to child protection are recorded in our Records or Processing Activity and are regularly reviewed; our online school privacy notices accurately reflect our use of data for child protection purposes.

- Any request for information will normally be supported by either signed consent or a data request form outlining why the information is required and how it will be handled. Safeguarding children will always be our priority and therefore there may be occasions when information is shared without this or where consent has not been gained, where gaining consent is either not possible or puts the child at risk.

7.2: Confidentiality

Confidentiality is an issue which needs to be discussed and fully understood by those working with children, particularly in the context of child protection.

- A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents / carers or pupils) or promise to keep a secret.
- In accordance with statutory requirements, where there is a child protection concern this must be reported to the DSL and may require further referral to and subsequent investigation by, appropriate authorities.
- Information about individual child protection cases may be shared by the DSL or DDSL with other relevant staff members. This will be on a 'need to know' basis only and where it is in the child's best interests to do so.
- If a victim asks the school not to tell anyone about a report of sexual violence or sexual harassment:
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
  - Even if a victim does not consent the sharing information, staff may still lawfully share it is there is another legal basis under the GDPR that applies.
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk).
    - The basis safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care.
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
  - Do all that they reasonably can to protect the anonymity of any child involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- Information sharing advice for safeguarding practitioners (HMG, 2018) includes '7 golden rules' for sharing information. Staff will have regard to this when making decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to a member of the safeguarding team.

Confidentiality is also addressed in this policy with respect to record-keeping in section 13, and allegations of abuse against staff in appendix 8.

8: Procedures: Recognising abuse and taking action

Staff, volunteers, Governors and trustees 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 DDSL(s)".

Schools in the Rayleigh Schools Trust work with local partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plan which provide additional support (through a Child in Need or Child Protection Plan).

All action is taken in accordance with the following guidance:

- Essex Safeguarding Children Board guidelines – the SET (Southend, Essex and Thurrock) Child Protection Procedures (ESCB, 2019)
- Essex Effective Support
- Keeping Children Safe in Education (DFE, 2023)
- Working Together to Safeguard Children (DFE, 2018)
- 'Effective Support for Children and Families in Essex' (ESCB)
- PREVENT Duty – Counter-Terrorism and Security Act (HMG, 2015)

Any staff member of visitor must refer any concerns to the DSL.

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

Where it is believed that a child is suffering or likely to suffer harm, or is in immediate danger, concerns will be referred by telephone to the Children and Families Hub (Essex) or MASH (Southend) and / or the police.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. **Anyone can make a referral**. Tell the DSL as soon as possible if you make a referral directly.

8.2: If you have concerns about a child

Concerns about a child should be discussed with the DSL or reported using My Concern, and a course of action will be agreed upon.

Less urgent concerns or requests for support will be sent to the Children and Families Hub via Essex Effective Support. The school may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.

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 the Children and Families Hub (telephone numbers are found in Appendix 5 of this policy and on the reverse of staff badges. They are also displayed prominently in the staffroom and department offices. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share any action you take with the DSL as soon as possible.

Make a referral to children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

8.3: 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 that they should have told you sooner.
- Explained what will happen next and that you will have to pass the information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words on My Concern. Stick to the facts, and do not put your judgment on it. Where you need to record an opinion, make it clear that you are doing so.
- Discuss this with the DSL immediately. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise that their experiences are harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers,

None of this should deter you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

8.4 Communication

Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents / carers. However, we will not do so where it is felt that to do so would place a child at greater risk of harm or impede a criminal investigation. If it is necessary for another agency to meet with a child in school, we will always seek to inform parents/carers, unless we are advised not to by that agency. On occasions, it may be necessary to consult with the Children and Families Hub and/or Essex Police for advice on when to share information with parents/carers.

8.5: Early Help Assessment

Members of the safeguarding team may use a Team Around the Family (TAF) planning meeting for families where there may be concerns and where there is likely to be multi-agency working. Our aim is to identify pupils or families who would benefit from further support at the earliest possible stage. If an early help assessment 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 lead practitioner.

The support provided may involve signposting or referring to outside agencies (using the Essex Directory of Support as a guide) or utilising the support within school (e.g., pastoral team, LD, PFS, counsellors).

The DSL will keep the case under constant review and the school will consider a referral to children's social care if the situation does not seem to be improving. A timeline of interventions will be monitored and reviewed. We will be mindful of the Essex windscreen of need and associated guidance in order to determine the best response to a child and family.

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

If you make the referral directly (see section 8.1 and 8.2), you must tell the DSL as soon as possible. The Children and Families Hub will make a decision in a timely manner 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 within 1 working day of the referral being made, 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 seek to escalate to ensure that their concerns have been addressed and that the child's situation improves.

8.7: If you discover that FGM has taken place or a pupil is at risk of FGM
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 United Kingdom and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

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 2 of this policy.

Under the Serious Crime Act 2015, **any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to how that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to do it.

You should report this to the police by dialling 101. Where there is a risk to life or likelihood of serious immediate harm, you should report the case immediately to police by dialling 999. In most cases reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day.

You 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 **girl under 18** must speak to the DSL and follow our safeguarding procedures.

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

Any member of staff who suspects that a pupil is *at risk of* FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

8.8: If you have concerns about extremism

The Counter-Terrorism and Security Act 2015 placed a new duty on schools: under section 26 of the Act, schools are required, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This is known as the Prevent duty.

It requires schools to:

- Teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion.
- Be safe spaces in which children / young people can understand and discuss sensitive topic, including terrorism and the extremist ideas which are part of terrorist ideology, and learn how to challenge these ideas.
- Be mindful of their existing duties which focuses on providing support at an early stage to people identified as being vulnerable to being drawn into terrorism.

Schools in the Rayleigh Schools Trust operate in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate.

Staff who have concerns should where possible speak to the DSL first to agree a plan of action. Where there is a concern, the DSL will consider the level of risk, seek advice from appropriate agencies 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, and children's social care.

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 the Children and Families Hub. Make a referral directly to children's social care, if appropriate (see section 8.1 and 8.2 above). Inform the DSL as soon as practically possible after the referral.

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.United Kingdom. Note that this is not for use in emergency situations.

In an emergency call 999 or the confidential anti-terrorism 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.

8.9: If you have a mental health concern

All staff in schools in the Rayleigh Schools Trust are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We understand that, where children have suffered abuse or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Where we have concerns this may impact on mental health, we will seek advice and work with agencies as appropriate to support a child and ensure that they receive the help they need.

Positive mental health is the concern of the whole community, and we recognise that schools play a key part in this. Schools in the Rayleigh Schools Trust aim to develop the emotional wellbeing and resilience of pupils and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors which can promote or strengthen resilience. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter-balance and promote further growth of resilience.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are, however, well placed to observe children day-to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, and Staff will be alert to those behavioural signs.

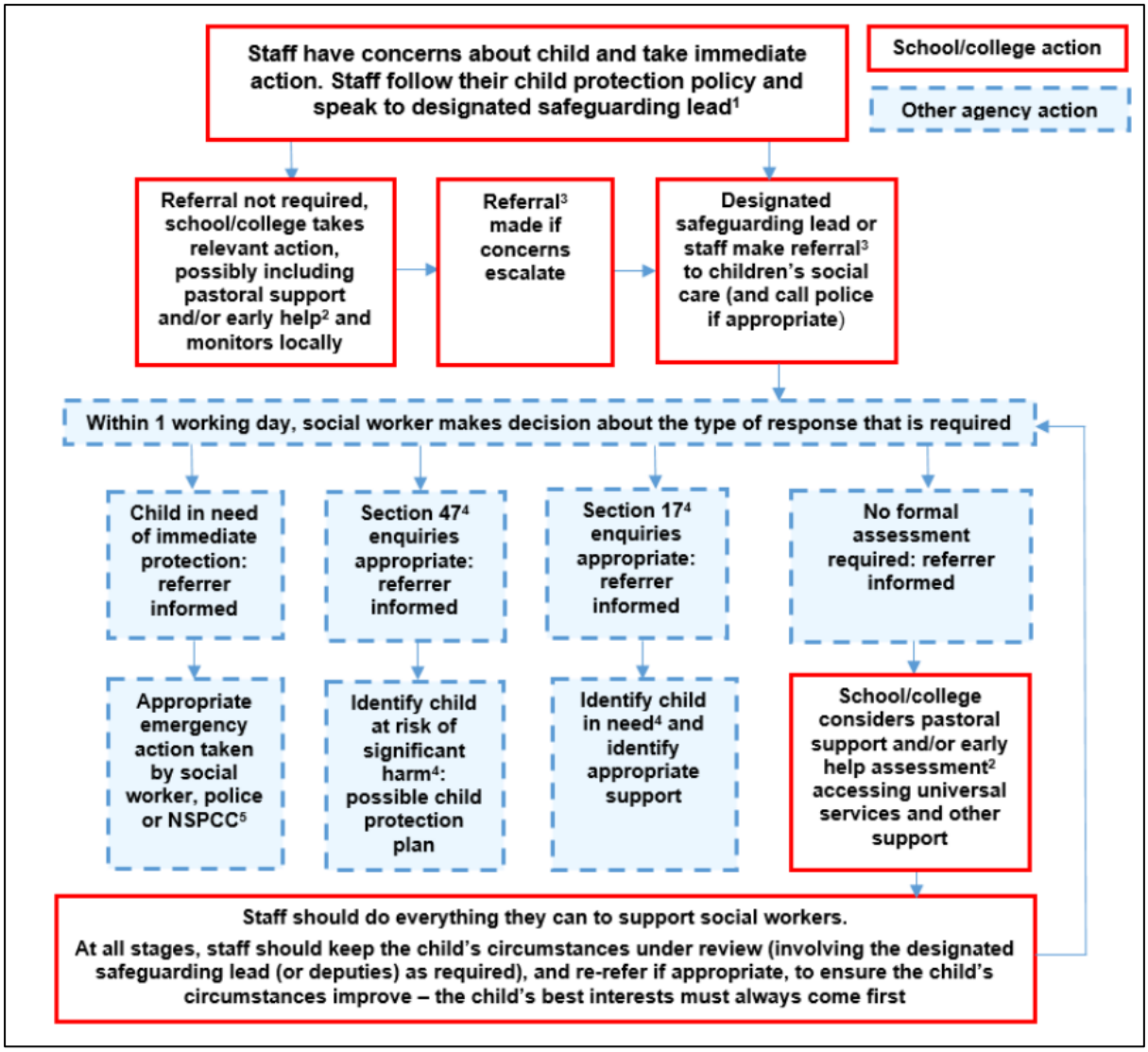
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in sections 8.1 or 8.2.

If you have a mental concern that is **not** also a safeguarding concern, speak to the Designated Mental Health Lead (DMHL) to agree a course of action and/or make a report on My Concern.

It is vital that we work in partnership with parents to support the wellbeing of our pupils. Parents should share any concerns about the wellbeing of their child with the school, so that appropriate support and interventions can be identified and implemented.

The Designated Mental Health Lead at Sweyne Park School is Adam Thomson. The Rayleigh Schools Trust has employed qualified counsellors and works with MHST to provide support to our pupils.

Figure 1: Actions Where there are concerns about a child



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

8.10: Concerns about a member of the workforce

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns are about the Headteacher, speak to the Chair of Governors.

The Headteacher/Chair of Governors will then follow the procedures set out in appendix 3, as appropriate.

Where you believe that there is a conflict of interest in reporting a concern about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the Local Authority Designated Officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow the school safeguarding policies and procedures, informing the DSL, and LADO if necessary, as you would with any safeguarding allegation.

8.11: 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", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also understand that some groups are potentially more at risk. Evidence shows that girls, children with SEND, and LGBTQ+ children are at greater risk. However, all child-on-child abuse is unacceptable and will be taken seriously.

Children who are abused by other children will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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, particularly if pre-planned
- 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 the sharing of nudes and semi-nudes).

See appendix 2 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse
If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation on My Concern and or in an emergency speak to the DSL directly, but do not investigate it.
- The DSL will contact the Children and Families Hub 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 in place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s). This will also include consideration of the location of the incident and, if relevant, any actions required to make the location safer. This will also include all other children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from any future harms. Our risk assessment will be recorded and reviewed regularly to ensure

that it remains relevant and fit for purpose. At all times, we will be actively considering any risks that are identified through our risk assessment, and its ongoing review, to our children. We will put measures in place to protect our children accordingly.

- The DSL will contact children and adolescent mental health services (CAMHS), if appropriate.
- We will do all we can to protect the anonymity of any children involved in any report of harmful sexual behaviour. This means we will consider carefully, based on the nature of the report, which staff should know about it, and which staff should know about any support that will be put in place for the children involved.

  We are aware of the potential impact of social media, which can facilitate the spreading of rumour and expose a victim's identity, making things more challenging for them. Where the use of social media becomes a factor and is affecting our capacity to manage a report and support our children, we will address this, linking with other agencies as appropriate.

The DSL will liaise with the relevant year teams in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and imposing a sanction accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or children's social care to determine this.
- There are circumstances that would make it unreasonable or irrational of us to reach our own view about what happened while an independent investigation is ongoing.

<u>Considerations</u>

In responding to an incident of child-on-child abuse, the safety of our children is paramount. We will use a proportionate approach, based on the principle that harmful sexual behaviour is not acceptable and will not be tolerated. Our approach will help us to ensure that all children are protected and supported appropriately. The following principles will guide us:

- The wishes of the victim in terms of how they want to proceed.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed.
- The ages and developmental stages of all children involved.
- Consideration of any power imbalance between the children involved.
- Consideration of whether the alleged incident is a one-off or part of a sustained pattern of abuse.
- That sexual violence and sexual harassment can occur within intimate personal relationships between children.
- The importance of understanding extra-familial harms and any necessary support for siblings following incidents.
- Consideration of any ongoing risks to the victim, other children, or school staff.
- Consideration of any other related issues and the wider context.

All concerns will be dealt with on a case-by-case basis. Our actions will not be judgemental about the guilt of the alleged perpetrator and will always be taken in the interests of all children involved, balanced with our duty and responsibilities to safeguard other children.

If the incident is a criminal offence and there are delays in the criminal justice process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Safeguarding and supporting a victim

We will assess what short-term and long-term support a child may need to help them manage the immediate aftermath of an incident, and to recover from what they have experienced. A child's existing support network will be central to this work; we will work with other partners as appropriate and in accordance with a child's wishes and, wherever appropriate, in discussion with parents/carers.

We will consider what is necessary to support a victim straight away. For example, making adaptations to their timetable and in-school support and taking steps to protect them from attention or peer pressure they may experience after making a report. We will also ensure that there is regular review of arrangements to be confident they meet the needs of all children involved.

It may be necessary to make requests for support to mental health and wellbeing agencies or for therapeutic intervention. We may also need to liaise with other agencies to remove inappropriate material from the Internet, such as the Internet Watch Foundation.

Safeguarding and supporting an alleged perpetrator

We have a duty of care to all children and will protect and support children who have displayed harmful sexual behaviour. We will do this through considering a child's needs, any risks to their safety and what multi-agency responses are needed to support them and their family.

Some children may not realise that they have behaved abusively. We will not use language that may make them feel judged or criminalised and ensure any intervention will be at the least intrusive level required to effectively address the behaviour.

We will carefully consider when to inform an alleged perpetrator(s) about a report of harmful sexual behaviour made against them. When a request for support is going to be made to Children's Social Care or the police, then, as a general principle, our DSL will speak with those agencies to discuss next steps, including how the alleged perpetrator(s) will be informed about the allegations. This will not prevent the school from taking immediate action to safeguard children, where required.

We will consider appropriate sanctions using our behaviour policy, and work with a child and their support network to consider measures which may help to address their behaviour.

Informing parents/carers

In line with our child protection procedures, we inform parents/carers about reports of sexual abuse unless to do so may place a child at additional risk. We will seek advice from other safeguarding partners in individual cases. In circumstances where parents/carers have not been informed, we will ensure that we support a child in any decision we take. This is likely to be with the support of Children's Social Care and any appropriate specialist agencies.

Ongoing support for children

Children who have experienced harmful sexual behaviour display a wide range of responses. Children may show clear signs of trauma, physical and emotional responses, or no overt signs at all. Children who display harmful sexual behaviour may also respond in these or other ways. We will remain vigilant and show sensitivity to the needs of all our children, for example, about attendance in lessons.

We will consider what ongoing support children may need and provide this on a case-by-case basis. For example, the support provided for children following a single incident of a lewd remark may be different from that following a report of sexual assault. Examples are pastoral support, counselling, and ensuring that there is a trusted adult for the children involved to speak with if they wish to. It

may be necessary for us to maintain arrangements to protect and support victims for some time, working with Children's Social Care and other agencies as required.

We may also need to provide support to children who have witnessed harmful sexual behaviour, or otherwise been affected. This will be informed by our risk assessment and ongoing work.

We will also consider whether any intervention or support is required as part of a whole-setting approach for our children, or with the wider school community.

Outcomes

We will always seek to ensure that outcomes are appropriate and proportionate in relation to a report, liaising with our safeguarding partners as appropriate.

The following scenarios may apply:

- **Manage internally:** in some cases of sexual harassment, for example one-off incidents, we may take the view that the children involved are not in need of early help or statutory intervention. In these cases, we will follow our other school policies in addressing matters, for example our behaviour/anti-bullying policies, and provide pastoral support where appropriate.
- **Early Help:** where statutory intervention is not required or agreed, we may use early help instead. This means providing support as soon as a problem emerges, at any point in a child's life. We will work with parents/carers and other relevant partners following this approach, which can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation.
- **Requests for support to children's social care:** Where a child has been harmed, is at risk of harm, or is in immediate danger, will be make a request for support to Children's Social Care. We will inform parents/carers of this unless to do so may put a child at additional risk. We will seek advice from other safeguarding partners in individual cases. If we make a request for support, Children's Social Care will consider whether the children involved need protection or other services. Where statutory assessments are appropriate, the school will work with Children's Social Care and other agencies as appropriate. Partnership working helps to ensure the best possible package of co-ordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children who require support. In some cases, Children's Social Care will review the evidence and decide that statutory intervention is not appropriate. If a statutory assessment is not considered appropriate by Children's Social Care, we will consider what other support for the children involved may be required. We will make further requests for support to Children's Social Care if we consider that a child remains in danger or at risk of harm.
- **Reporting to the police:** Where a report of rape, assault by penetration or sexual assault is made, we will report it to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Where we have made a report to the police, we will consult with them and agree what information can be disclosed to our staff and others, in particular the alleged perpetrator and their parents/carers. We will also discuss the best way to protect the victim and their anonymity. Whilst there is a criminal investigation, we will work closely with the police and other agencies as appropriate to support all children involved (including potential witnesses). This will help to ensure that any actions we take do not jeopardise a police investigation. Sometimes that police will decide that further action is not required. In these circumstances we will continue to engage with other agencies to support the children involved.

Creating a supportive environment in school and minimising the risk of child-on-child abuse:
We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, or by pupils towards adults, including requesting or sending sexual images.
- Challenge any physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Be vigilant towards issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with regard to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent. We work in accordance with government regulations to make the subjects of Relationships Education (for primary pupils) and Relationships and Sex Education (for secondary pupils), and Health Education (for all pupils in state-funded schools) mandatory. In particular, we help our children to develop the skills to understand:
    - The characteristics of positive, respectful and healthy relationships, including friendships;
    - Boundaries, privacy and consent;
    - What constitutes sexual harassment and sexual violence and why these are always unacceptable; and
    - The concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, and rape.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 8 below).
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure that the victim, alleged perpetrator(s) and any witnesses are not bulled or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should assume that it is happening here
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to.
        - A friend may make a report.
        - A member of staff may overhear a conversation.
        - A child's behaviour may indicate that something is wrong.
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.

- That a pupil harming another child could be a sign that the child is being abused themselves and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe that a child may be at risk from it,
- That they should speak to the DSL if they have any concerns, and/or make a report using My Concern.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

8.12: Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images / videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately in person, and make an urgent report on My Concern.

You must **not**:

- View, copy, print, share, store or save 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 involve 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 involved or their, or other, parents/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 help and support.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the member of staff who reported the incident and member of the relevant pastoral team(s). 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 image(s) in order to safeguard the young person (in all but the most exceptional cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image has been shared more widely and via what services and/or platforms (this may be unknown).
- Any relevant facts about the pupils involved which would influence a risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to involve the parents/carers of the pupils involved (in most cases, parents/carers should be involved).

The DSL will make an immediate referral to the 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 images or videos suggests that 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 images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (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. The decision will be made and recorded in line with the procedures set out in this policy (using My Concern).

Further review by the DSL
If at the initial review stage, a decision has been made not to refer to the police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
They will hold interviews with the pupils involved (if appropriate), or guide other members of staff in doing this.

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 or the police immediately.

Informing parents/carers
The DSL will inform parents/carers at an early stage and keep them involved in the process, or guide another member of staff in so doing, unless there is a good reason to believe that involving them would put the child at risk of harm

Referring to the police
If it is necessary to report an incident to the police, this will be done through dialling 101 or using the Essex Police website to make a report online.

Recording incidents
All incidents of sharing nudes and semi-nudes, and the decisions made in responding to them, will be recorded using My Concern.

Curriculum coverage
Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education (SRE), delivered through CPRE lessons. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
- 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 and when it may be deemed as online sexual harassment
- 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.

8.13: Reporting systems for pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils confidently to report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Pupils are advised that they can speak to any adults working at schools in Rayleigh Schools Trust about any concerns and/or allegations. Those adults will need to speak to members of the school's Safeguarding Team.
- Pupils can make reports anonymously using the online Toot Toot system. The pupil's anonymity will only broken if it is necessary to identify a child who has experienced, or who is at risk of experiencing, harm.

9: Contextual safeguarding

Safeguarding incidents and behaviours can be associated with factors outside schools, and children can be at risk of abuse or exploitation in situations outside their families. KCSIE (2023), paragraph 23 says: 'Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation'. All staff are aware of contextual safeguarding and the fact that they should consider whether environmental factors present in a child's life are a threat to their safety and/or welfare.

To this end, schools in the Rayleigh Schools Trust consider the risks and issues in the wider community when considering the wellbeing and safety of a child, and share this with other agencies to support better understanding of a child and their family.

10: Online safety and the use of mobile technology

We recognise that our children are growing up in an increasingly complex world, living their lives on and offline. This presents many positive and exciting opportunities, but we recognise it also presents challenges and risks. Any pupil can be vulnerable online, and their vulnerability can fluctuate depending on their age, developmental stage, and personal circumstance. We want to equip our pupils with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so that they are able to reap the benefits of the online world. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, schools in the Rayleigh Schools Trust aim to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers, Governors and trustees.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk:

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

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

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, newsletter (*The Sweyne Park Times* and *Glebe Gazette*) and through promoting and, where appropriate, hosting external speakers.
- Make sure staff are aware of the restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their mobile phones to school for their own use, but will limit such use to non-contact time when pupils are not present, unless they are on duty or are using their mobile phone to summon emergency assistance (e.g., First Aiders from Pupil Services, or 999).
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers, Governors and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile phone.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones. It should be noted that distribution of images/videos of an incident or incidents either within and/or outside school and that on the balance of probability are likely to offend, upset, or humiliate will incur a sanction of at least one day's suspension and a phone ban whilst in school for a fixed period.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DFE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems which are regularly reviewed.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

- Provide regular safeguarding and child protection updates to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises the policy of the Rayleigh Schools Trust to online safety and mobile phone use. For comprehensive details about our schools' policies on online safety and the use of mobile phones, please refer to their online safety policy and mobile phone policy, which you can find on the schools' websites.

10.1: Artificial Intelligence (AI)

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

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

Schools in the Rayleigh Schools Trust will treat any use of AI to access harmful content or to bully pupils in line with this policy and our behaviour/anti-bullying policies.

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

11: Notifying parents/carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Children and Families Hub before doing so.

In the case of allegations of abuse made against other children, we will liaise with our safeguarding partners to make sure that our approach to information sharing is consistent. For example, where a pupil is likely to be a suspect in a criminal investigation, we will seek guidance from the police and Children and Families Hub before notifying the child's parents/carers.

In consultation with other agencies, the DSL will:

- Meet with the victim's parents/carers, along with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents/carers to discuss support for them, and what is being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s).

12: Children potentially at risk of greater harm

We recognise that some children may be potentially at risk of greater harm and require additional help and support.

12.1: Pupils with special educational needs, disabilities or health issues:

We recognise that pupils with special educational needs / disabilities (SEND) or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. 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 condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-related bullying) than other pupils.
- The potential for pupils with SEND or certain health conditions being disproportionately impacted by behaviours such as bullying without showing any outward signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Pupils with SEND may be less able to recognise or understand that they are being abused.

We offer additional support for these pupils, along with ensuring any appropriate support for communication is in place. For example, vulnerable pupils with SEND, including all pupils with an EHCP, are allocated a keyworker, with whom they have a timetabled session at least fortnightly. LD is also open to pupils at break, lunch and before/after school.

Any abuse involving pupils with SEND will require close liaison between the DSL and SENDCo / Head of the Resource Base for Deaf Pupils. The SENDCo is a member of the Safeguarding Team to facilitate this.

12.2: Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that where a child has a social worker, their 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. We take these needs into account when making plans to support pupils who have a social worker.

The DSL and all members of staff will work with and support social workers and other appropriate agencies to ensure that there is a joined-up approach to planning for these pupils and that they receive the right help at the right time.

In order to support pupils with a social worker we will:

- Follow the guidance in any child protection or child in need plans.
- Ensure that they know who they can approach for help or if they have any specific concerns.
- Monitor their welfare carefully, including talking to them regularly about their wellbeing.
- Ensure that a member of staff, usually the DSL or DDSL, attends any child protection or child in need meetings, including speaking on their behalf at such meetings if they request it.
- Monitor their attendance carefully, and report any unexplained absence to social care.
- Ensure that they have access to all elements of school life, including visits and other similar activities.
- Ensure that all relevant staff are aware that the child has a social worker and the circumstances around this, on a 'need to know basis', ensuring that pastoral staff are aware that any concerns regarding the pupil should be registered with the DSL, no matter how minor they appear to be.

12.3: 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.

Each of the schools in Rayleigh Schools Trust has appointed a Designated Teacher who is responsible for promoting the educational achievement of looked-after children and previously looked after children in accordance with statutory guidance, along with a responsible Governor.

The Sweyne Park School:
Designated Teacher: Richard Bradley
Governor: Jacqui Clements

Glebe Primary School:
Designated Teacher: Michaela Hembling
Governor: Dan Jordan

As part of their role, the designated teacher 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.
- Arrange for a member of staff to take a particular interest in the pupil's welfare and talk to them regularly
- Offer in school support such as anger management, assertiveness or social skills training as appropriate.
- Monitoring their attendance carefully and reporting any unexplained absence to social care and the Education Welfare Service.
- Monitoring their academic grades carefully to ensure that they are making expected progress.
- Looking out for difficulties with homework or resources that may be a result of their being or having been in care, and giving them help to organise and manage their work by providing the resources needed.
- Checking that they have access to all elements of school life, including visits and other similar activities.

In addition, we also keep a record of those pupils who are looked after by someone other than a parent, adopted or on Special Guardianship Orders. We offer them support appropriate to their particular circumstances.

12.4: Young carers
A young carer is anyone under the age of 18 who on a regular basis provides emotional or physical support to a person who is disabled, physically or mentally unwell or who misuses substances. We recognise that where this is the case this may not often be publicised by the family.

Caring responsibilities can significantly impact on a child's health and development. Young carers may experience:

- Social isolation

- Lower school attendance
- Lower educational progress
- Impaired development of their individual identity and potential
- Low self-esteem
- Emotional and/or physical neglect
- Conflict between loyalty to the person who receives their care and their wish to have their own needs met.

We offer support to these pupils appropriate to their individual situation. A member of staff is designated as the young carers' co-ordinator, and there is a monthly breakfast club as part of our support package.

12.5: LGBTQ+ pupils

The fact that a child or young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether or not this is the case) can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. At Sweyne Park School, we endeavour to reduce the additional barriers faced by providing a safe space for them to speak through our LGBTQ+ support group, and staff who support pupils from the LGBTQ+ community wear a rainbow-coloured lanyard so that they are identifiable to the pupils.

12.6: Private Fostering

A private fostering arrangement is one that is made privately (without the arrangement of a local authority) for the care of a child who is under the age of 16 (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority there is no duty for anyone, including the foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements. This will be done by a referral to the Children and Families Hub.

13: Record-keeping

Well-kept records are essential to good child protection practice. Schools in the Rayleigh Schools Trust are clear about the need to record any concern held about a child or children within our school and when these records should be shared with other agencies.

Any member of staff receiving a disclosure of abuse or notice signs or indicators of abuse, or having any other safeguarding concerns, will record it as soon as possible, using My Concern. If there is a concern that the pupil is at immediate risk of harm, this should be reported in person to the DSL immediately. Any records should be added to My Concern within 24 hours.

The record should include:

- A clear and comprehensive summary of the concern, including what was said or seen (if appropriate, using a body map to record), giving the date, time and location.
- This will be presented to the DSL on My Concern, who will decide on appropriate action and record this accordingly, so actions taken, decisions reached, and the outcome are fully recorded.

Concerns and referrals are held on My Concern, which provides a separate electronic file for each child. These are separate from any other pupil files held. These records are held securely and are only available to those who have a right or professional need to see them.

All child protection records are thus stored securely and confidentially and are retained **either**:

(a) until they reach 25 years of age; **or**
(b) until they transfer to another school/educational setting.

Safeguarding records for pupils who were not on roll at Trust schools after September 2019 are kept in a locked cupboard and electronically on a secure area of the school's IT system.

In line with statutory guidance, where a pupil transfers from our school to another school/educational setting (including colleges), their child protection record will be forwarded to the new educational setting. Where the new setting also uses My Concern, this will be done electronically using the functionality of My Concern to facilitate this. Where the setting does not use My Concern, these will be sent using secure post; local schools' records will be collected or hand delivered. These will be marked 'Confidential' and for the attention of the receiving school's DSL, who will be named on the address label, with a return address on the envelope so it can be returned to us if it goes astray. This will be sent separately from the main pupil file and any SEND files. We will obtain evidence that the paperwork has been received by the new school and then destroy any copies held by schools in the Trust, using the Archive functionality of My Concern to facilitate this.

To allow the new school / college to have support in place when the child arrives, this should be within:

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

In addition, if the concerns are significant or complex, and or children's social care are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 7 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.
- Appendix 8 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

14: Interagency working

It is the responsibility of the DSL to ensure that the school is represented at, and that a report is submitted to, any statutory meeting called for children on the school roll or previously known to them. Where possible and appropriate, any report with be shared in advance with the parents/carers. The member of staff attending the meeting will be fully briefed on any issues or concerns that the school has and be prepared to contribute to the discussions.

14.1: Social Care: Care, Child Protection or Child In Need Plans

If a child is subject to a Care, Child Protection or Child In Need plan, the DSL will ensure that the child is monitored regarding their school attendance, emotional wellbeing, academic progress, welfare and presentation. If the school is part of the core group, the DSL will ensure that the school is represented, provides appropriate information and contributes to the plan at these meetings. Any concerns about the CP/CIN plan and/or the child's welfare will be discussed and recorded at the core group meeting, unless to do so would place the child at further risk of significant harm. In this case, the DSL will inform the child's key worker immediately and record that they have done so and the actions agreed on My Concern.

14.2: Police – Police and Criminal Evidence Act 1984 – Code C

The DSL and DDSLs are aware of the requirement for children to have an appropriate adult when in contact with police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18 shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point. The DSL will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence that they may suspect. This communication will be recorded on My Concern.

If having been informed of the vulnerabilities, the DSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned[2] before they are questioned about an offence[3], or asked further questions if answers they give provide the grounds for suspicion, or if when put to them the suspect's answers or silence (i.e., the failure or refusal to answer or to answer satisfactorily) may be given in evidence to a court in a prosecution.

If a child or vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult means in the case of a child:

[2] The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

[3] A person need not be cautioned if questions are for other necessary purposes, e.g.: solely to establish their identity or ownership of a vehicle; to obtain information in accordance with any other statutory requirements; in furtherance of the proper and effective conduct of a search, e.g., to determine the need to search in the exercise of powers of stop and search or to seek co-operation when carrying out a search; or to seek verification of a written record.

- The parent/carer or, if the child is in the care or a local authority, a person representing that authority.
- A social worker of a local authority.
- Some other responsible adult aged 18 or over who is not:
  - A police officer;
  - Employed by the police.
  - Under direction or control of a chief officer of a police force;
  - A person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further evidence can be found in the Statutory guidance – PACE Code C 2019.

15: Training

15.1: All staff

All staff receive Level 2 safeguarding training on induction, including online safety, renewed annually. This ensures that they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect.

This training will:

- Be integrated, aligned and considered as art of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the schools' safeguarding partners, including the Essex Safeguarding Children Board (ESCB).
- Include online safety, including an expectation of the expectations, roles and responsibilities for staff around filtering and monitoring.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment.
  - Have a clear understanding of the needs of all pupils.
- Include details of the school's whistleblowing procedures and online safety,

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, including on online safety, through emails, the staff bulletins, staff briefings and as part of the schools' CPD offer.

Staff are provided with the following policies on induction:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct

In addition, staff must read the following documents annually:

- Keeping Children Safe in Education (2023) – Part 1 and Annex B;
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Behaviour Policy

Contractors who are regularly on site during the school day (e.g., cleaners) will also receive safeguarding training.

Supply agency staff will receive safeguarding training before working in the school, although we recognise that the supply agencies provide safeguarding training, in order that supply staff are clear on the safeguarding procedures at schools in the Trust.

Volunteers will receive appropriate training.

15.2: The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads
In line with statutory requirements, the DSL and DDSLs will undertake Level 3 child protection 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 attending briefings organised by safeguarding partners, the ECC safeguarding bulletin, meeting other DSLs through the local Safeguarding Forum).

They will also undertake Prevent awareness training and training in inter-agency working and other matters as appropriate.

15.3: Governors and Trustees:
All Governors and Trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school/Trust to deliver a robust whole-school approach to safeguarding.

To support them in their role, the Chair of Governors will undertake Safer Recruitment training and subsequent refreshers.

15.4: Safer Recruitment Training
Safer Recruitment Training is available to all relevant staff who are involved in the recruitment process.

At least 1 person conducting any interview for any post at schools in the Trust will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 7 of this policy for more information about the Trust's safer recruitment procedures.

16: Teaching about Safeguarding

Children who attend schools in the Rayleigh Schools Trust are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. At Glebe Primary School, topics relating to safeguarding are covered in PSHE and RSE lessons. The curriculum in relation to safeguarding is currently being reviewed.

At Sweyne Park School, topics relating to safeguarding are covered in a variety of subjects, including English, Science and History. Our principal vehicles for the delivery of safeguarding topics, including Sex and Relationships Education and Health Education, are CPE (Citizenship and Personal Education) lessons, and the tutor time Safeguarding Curriculum. This covers topics including:

- healthy and respectful relationships

- boundaries and consent
- stereotyping, prejudice, and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Full details of this can be found in the relevant curriculum maps and the Sex and Relationships Education policy.

17: Checking the identity and suitability of visitors

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

Visitors are expected to sign in using our electronic system and wear a visitor's badge.

Visitors to the school who are visiting to work individually with children for a professional purpose (e.g., Educational psychologist, Specialist Teacher), 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 Local Authority, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors will be accompanied by a member of staff at all times.

We will not invite into school any speaker who is known to disseminate extremist views.

18: Use of Rayleigh School Trust premises:

Where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services /activities are children on the school roll), the premises manager or a nominated member of staff will:

- Seek written assurances that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
- Make sure that there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.

Meeting these safeguarding requirements are a condition of using the school premises, and any agreement to use the premises will be terminated if the other body fails to comply.

We will carry out appropriate checks to ensure that any individual or organisation using Rayleigh Schools Trust facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform the LADO.

19: Use of reasonable force:

The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people, such as guiding a child to safety or breaking up a fight. 'Reasonable' means using no more force that is needed. Our school works in accordance with statutory guidance and local guidance on the use of reasonable force (see section 3) and recognises that where intervention is required, it should always be considered in a safeguarding context.

20: Concerns about school safeguarding policies

20.1: 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 8).

20.2: Other concerns / whistleblowing

All members of staff and the wider school community should be able to raise concerns about poor or unsafe practice and feel confident that any concern will be taken seriously by the school's leadership team. The Rayleigh Schools Trust have 'whistleblowing' procedures in place, and these are available in each of the schools' Whistleblowing Policy. In relation to concerns regarding safeguarding procedures, staff can:

- Speak with any member of the school's safeguarding or Senior Leadership Team.
- Contact the Safeguarding Governors.

However, for any member of staff who feels unable to raise concerns internally, or where they feel that their concerns have not been addressed, the may contact the NSPCC whistleblowing helpline on: 0800 028 0285 (line is available from 8am to 8pm, Monday to Friday) or by email at: help@nspcc.org.uk.

Parents or others in the wider school community who do not wish to raise their concerns with the school directly can contact the NSPCC general helpline on: 0808 800 5000 (24-hour helpline) or email: help@nspcc.org.uk.

21: Monitoring arrangements:

This policy will be reviewed at least **annually** by Richard Bradley (DSL – Rayleigh Schools Trust). At every review, the LGB of each school in the Trust will be consulted and asked to recommend for approval by the Board of Trustees.

22: Links with other policies:

This policy links to the following policies and procedures for each of the schools in the Rayleigh Schools Trust:

- Behaviour
- Staff Code of conduct
- Complaints
- Health, Safety and Wellbeing
- Attendance
- Online Safety
- Mobile Phone Use
- Equality

- Relationships, Health and Sex Education
- Curriculum
- Privacy Notices
- Anti-bullying
- Whistleblowing
- IT Acceptable Use

Appendix 1: types of abuse[4]

Abuse is described in Keeping Children Safe in Education (DFE, 2023) in the following way:

[Abuse is] a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Keeping Children Safe in Education refers to 4 categories of abuse:

- Physical
- Emotional
- Sexual
- Neglect

Abuse (and other 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 only valued 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 placed upon 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 cyber-bullying), causing children 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.

[4] The information in this appendix is based on the Department for Education's statutory guidance, Keeping Children Safe in Education (DFE, 2023).

- 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 perpetrated solely 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 a 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 (excluding 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.

Our staff will always reassure children who report abuse/victims of abuse that they are taken seriously and that they will be supported and kept safe. We will never make a child feel ashamed for reporting abuse, nor make them feel that they are causing a problem.

All staff in our school are aware of the signs of abuse and neglect so we are able to identify children who may be in need of help or protection. All staff are aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context (contextual safeguarding).

Appendix 2: Specific safeguarding concerns

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 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 series of incidents over time, and range from opportunistic to complex organised abuse. It can affect children both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific examples of CCE include: young people being forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines – see below), or forced to shoplift or pickpocket, or to threaten other young people. They may also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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/or 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 and/or make a report using My Concern. The DSL will trigger the local safeguarding procedures, including a referral to children's social care and the police, if appropriate.

County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using a dedicated mobile phone line or other form of 'deal line'.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Child Sexual Exploitation[5]

Child Sexual Exploitation is a form of child sexual 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 that 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.

Indicators of CSE can include:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation.
- Gang association and/or isolation from peers / social networks.
- Excessive receipt of texts or phone calls.
- Multiple callers (unknown adults or peers).
- Returning home under the influence of drugs / alcohol.
- Having an older boyfriend or girlfriend, or relationships with controlling individuals or groups.
- Inappropriate sexualised behaviour for age.
- Suffering from sexually transmitted infections or becoming pregnant.
- Frequenting areas known for sex work.
- Concerning use of the internet or other social media.
- Increasing secretiveness around behaviours.
- Evidence or suspicions of physical or sexual assault.
- Exclusion or unexplained absences from school.
- Leaving home/care without explanation and persistently going missing or returning late.
- Self-harm or significant changes in emotional wellbeing.

In particular, it is understood that a significant number of children who are victims of CSE go missing from home, care and/or education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.

Potential factors that heighten vulnerability include:

- Having prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe / stable home environment, now or in the past (for example, domestic abuse or parental substance misuse, mental health issues or criminality).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.

[5] More information about CSE can be found in: *Child sexual exploitation: Definition and a guide for practitioners* (DFE, 2017).

- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted case histories).
- Sexual identity.

Although these factors increase the risk of CSE, it must be remembered that not all children with these indicators will be exploited. Similarly, CSE can occur without any of these issues – all children are potentially vulnerable to CSE.

If a member of staff suspects CSE, they will discuss this with the DSL and/or make a report on My Concern. The DSL will take the lead on these issues, and trigger local safeguarding procedures, including a referral to children's social care and the police, if appropriate. This one page process map sets out arrangements for CSE in Essex: https://schools.essex.gov.United Kingdom/pupils/Safeguarding/Child_Sexual_Exploitations/Documents/CSE%20Process%20Map.pdf

Children who are absent from education

All children, regardless of their age, ability, aptitude and any SEND they may have, are entitled to a full-time education. Schools in the Rayleigh Schools Trust recognise that a child missing education is a potential indicator 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 school
- Come from new migrant families.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being 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 our child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to children's social care and/or the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

We monitor attendance carefully and address poor or irregular attendance without delay. Parents should always inform us of the reason for any absence. We will follow up with parents/carers when pupils are not in school. Where contact is not made, a referral may be made to another agency (Education Access Team, social care or police). Parents are required to provide at least two contact numbers to the school, to enable us to communicate with someone if we need to. Parents should also remember to update the school as soon as possible if the numbers change.

We will follow our procedures for unauthorised absence and for dealing with children who are absent 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 the future. Our school must inform the local authority of any pupil who has been absent without permission for a continuous period of 10 days or more, and will inform the local authority if a child leaves the school without a new school being named. We will adhere to the 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. We will ensure that pupils who are expected to turn up at the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their start date. For information regarding children who go missing during the school day, see Appendix 3.

Child-on-child abuse, including sexual violence and harassment between children in schools
Child on child abuse is when children abuse other children. This type of abuse can take place in various settings. This includes at school, at home (or at another home), or in public places. Ats school, issues can occur in places which are supervised and unsupervised. For example, abuse may occur in toilets, corridors, changing areas, outside spaces such as the playground, and when children are travelling home. It can also take place both face-to-face and online, and can occur simultaneously between the two. It can occur between two children of any age and sex, or through a group of children abusing or harassing a child or group of children.

Children's sexual behaviour exists on a wide continuum. It ranges from normal and developmentally expected (age-appropriate) to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

Schools in the Rayleigh Schools Trust have a zero-tolerance approach to sexual violence and sexual harassment and any other inappropriate or abusive behaviour, and recognise that even if there are no reports, it is likely that it is occurring. We understand the barriers which may prevent a child from reporting abuse and work actively to remove these. We will take swift action to intervene where this occurs, challenging inappropriate behaviours when they occur – we do not normalise abuse, nor allow a culture where it is tolerated.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration, sexual assault, and causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments (telling sexual stories, making lewd comments, making sexual remarks about clothes or appearance, calling someone sexualised names), 'jokes'/taunting, physical behaviour (deliberately brushing against someone, or interfering with someone's clothes), displaying pictures, photos or drawing of a sexual nature,

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) (this is a criminal offence).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (this is a criminal offence).
- Initiation / hazing type violence and rituals (this could include activities including harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. We will seek advice and support from other agencies as appropriate.

We use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Schools in the Rayleigh Schools Trust understand the different gender issues that can be prevalent when dealing with child-on-child abuse. We will never make a child feel ashamed for reporting abuse, nor that they are creating a problem by doing so.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

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.

Domestic abuse can encompass a wide range of behaviours. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are personally connected to each other:

a) Physical or sexual abuse;
b) Violent or threatening behaviour;
c) Controlling or coercive behaviour;
d) Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
e) Psychological, emotional or other abuse.

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

The definition of domestic abuse applies to children if they see, or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside the home.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Schools in the Rayleigh Schools Trust recognise that exposure to domestic abuse can have serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. We work with other key partners and will share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

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

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day in 0808 2000 247.

Homelessness
Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The DSL will be aware of contact details and referral routes into the local housing authority so that they can raise/progress concerns at the earliest opportunity where appropriate.

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 and/or make a report on My Concern; the DSL will activate local safeguarding procedures.

FGM
Female Genital Mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

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 8.7 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 care 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, especially with noticeable behaviour changes (e.g., withdrawn, low mood) on return.
  - 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[6].
- 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.
- Parents who wish to withdraw their children from SRE / PSHE lessons.
- Parents who wish to take their daughter out of school to visit a country where FGM is known to be practiced (especially before the summer holidays).
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM.
  - Having a limited level of integration within UK society.
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at 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 conversation).
  - 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.

[6] *Multi-agency guidance on female genital mutilation* (HMG, 2020) contains information regarding the international prevalence of FGM (pp.9-11).

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

Staff should not assume that FGM only happens outside the United Kingdom.

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 '1 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 report this to the DSL, in person and/or through My Concern.

The DSL will:

- Speak to the pupil in a secure and private place, or guide another member of staff in doing so.
- Activate the local safeguarding procedures and make a referral to the Children and Families Hub.
- They may seek advice from the Forced Marriage unit on 020 7008 0151 or fmu@fco.gov.United Kingdom
- Refer the pupil for appropriate support, either from within the school's support systems or outside agencies.

It is also illegal to cause a child under the age of 18 to marry even if violence, threats and coercion are not involved. The marriage and Civil Partnership (Minimum Age) Act 2022 that came into force in February 2023 means that 16- and 17-year-olds will no longer be allowed to marry or enter into a civil partnership, even if they have their parents' consent. Any concerns that pupils or students may be getting married should be reported on My Concern and/or to the DSL in person.

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 action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes with 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.

Under Section 26 of the Counter-Terrorism and Security Act 2015 schools are required, in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent Duty.

It requires schools to:

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

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 the police.

We use the curriculum to ensure that children understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British values supports quality teaching and learning, while making a positive contribution to the development of a fair, just and civil society.

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 children's behaviour, which could indicate that they may be in need of help or protection.

The Government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised include:

- Refusal to engage with, or becoming abusive to, peers who are different to 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.
- Glorifying violence, especially to other faiths or cultures.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist or illegal literature.
- Verbalising anti-British or anti-Western views.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.
- Making remarks or comments about being at extremist events or rallies outside school.

- Intolerance of difference, including faith, culture, gender, race or sexuality.
- Out of character changes in dress, behaviour and peer relationships.
- Secretive behaviour

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 8 of this policy, including discussing their concerns with the DSL and/or making a report on My Concern. Staff should **always** take action if they are worried.

Schools in the Rayleigh Schools Trust operate in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate. Where we have concerns about extremism or radicalisation, we will seek advice from appropriate agencies and, if necessary, refer to children's social care and/or the Channel Panel[7]

Serious Violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Changes in friendships or relationships with older individuals or groups.
- Significant decline in educational performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained new gifts or possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

Risk factors which increase the likelihood of involvement in serious violence include:

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

All staff will be are of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL in person and/or on My Concern.

[7] CHANNEL is a national programme which focuses on providing support at an early stage to people identified as being vulnerable to being drawn into terrorism.

Appendix 3: Arrangements for pupils who go missing during the school day

1: Introduction

Missing children are among the most vulnerable in our community. Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

The definition of missing used in Essex is 'anyone whose whereabouts cannot be established will be considered as missing until located and his or her wellbeing confirmed (College of Policing Authorised Professional Practice Guidance).

A child going missing could be a 'one off' incident that, following investigation, does not need further work. However, a child going missing frequently could be an indicator of underlying exploitation or other forms of child abuse.

Rayleigh Schools Trust considers missing episodes like any other child protection concern and take action as appropriate, for example by contacting parents / careers, the Children and Families Hub and, in an emergency, the priority line or police. It may be appropriate to use the Early Help Procedures (including a Team Around the Family meeting) to address the issues and prevent escalating. Advice should be sought and concerns escalated if there is no improvement.

Where children are missing frequently and are open to children's social care, a Missing Prevention Plan may be in place. Where this is the case, the school may be set actions as part of the Missing Prevention Plan and should receive a copy if consent has been provided.

2: When a child goes missing

When it is suspected that a child is missing from school this must be addressed immediately.

- **A member of the safeguarding team should be immediately notified so that a risk assessment can be carried out swiftly.** The DSL / DDSL will assess the urgency and risk, using their professional judgment. This will inform the plan of action.
- School staff will take active steps to locate the child. This will include:
  - searching the premises and surrounding areas;
  - contacting the child's parent / carer and ask for the child to be contacted if possible.
- If none of these actions locate the child, they will be reported missing to the police by dialling 101, **or 999 if there is a belief that the child is immediately suffering significant harm.** It is important that the police are informed of any checks already completed as it may save time and prevent duplication of tasks set by the police to locate a child.
- Staff at the school must inform the child's parents/carers that the child has been reported missing. Most often the parent/carer will be contacted in the first instance. However, if following the risk assessment, the child is regarded as vulnerable and at risk of significant arm, the DSL may decide to notify the police and then notify the parent/carer. Where the child has a social worker, they should also be informed.
- After a child has been reported missing, any further information should be communicated to the police by telephoning 101 or 999 if the matter is an emergency. Further information must be passed to the police as soon as possible, as officers will continue to search for the child until informed of their return.

3: When the child is found

If the child is found by school staff, or if the child returns to the school of their own accord, the police must be notified immediately if the matter is an emergency. It is important that this action is prioritised, as the child will remain classified as a missing person until seen by the police. The child's parents/carers will be notified.

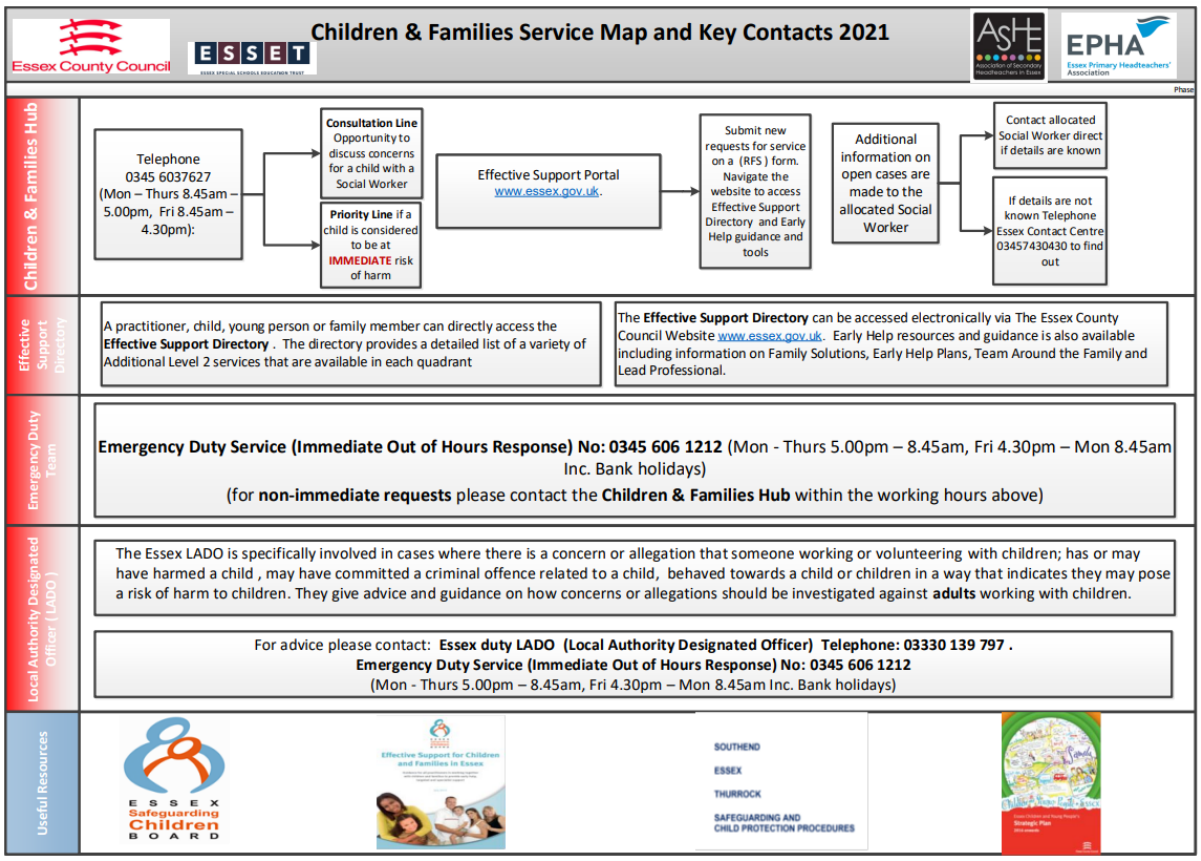
The multi-agency response

- Schools in the Rayleigh Schools Trust will share information with police, children's social care and any agency involved with the child who has gone missing and where necessary take action to safeguard or offer support to the child and family.
- On receiving a report of a missing child, Essex Police will classify the child as missing and will respond based on the level of risk involved.
- Essex Police will conduct a vulnerability interview for all children who have been missing and have returned. It may be that the child refuses to engage or speak with police. On these occasions, the parents/carers can assist by reporting to officers their observations on the child's return, e.g., did the child shower, have gifts, appear unwell or under the influence of any substance etc. The school may also be able to contribute to this process and will provide the police with any relevant information or observations.
- Each child that returns from missing will be offered a 'missing chat' (an independent return from missing interview) by a person not involved in their care. This will be facilitated by the Local Authority with responsibility for the child. Missing chats are offered to all children from Essex who go missing.
- Following a missing incident, a member of staff known to the pupil will meet with them to seek to ensure that there are no issues that have not already been discussed.

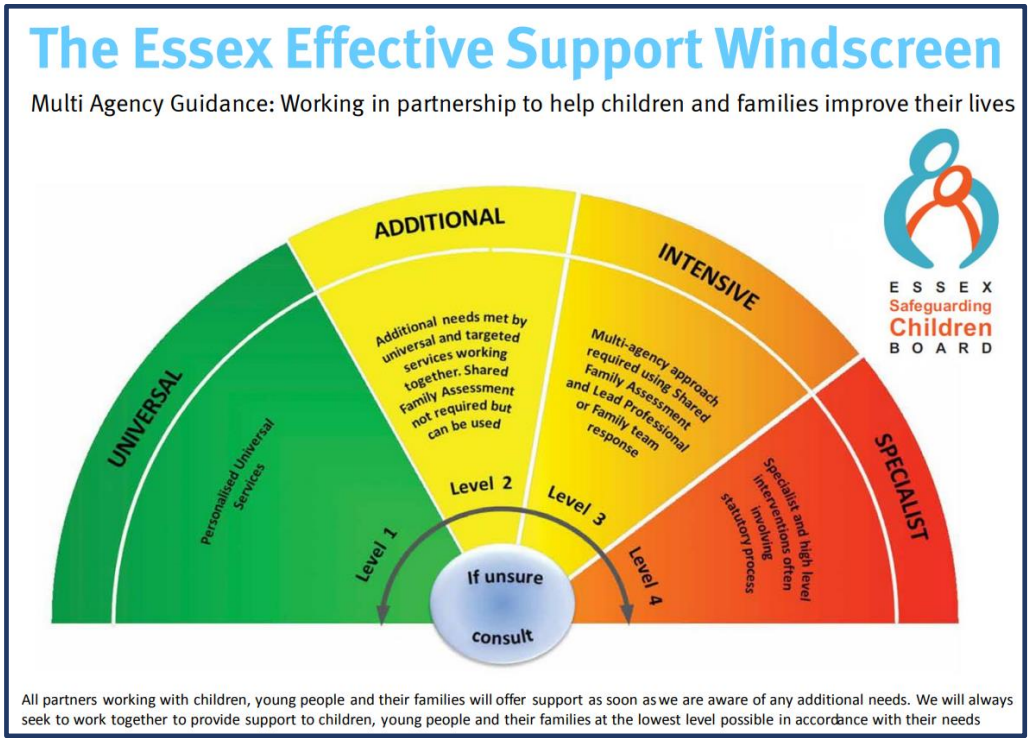
4: Useful contacts:

- Shane Thomson – ECC Missing Co-ordinator: shane.thomson@essex.gov.uk
- Lucy Stovell – ECC Missing Chats: lucy.stovell@essex.gov.uk

Appendix 4: Children and Families Service Map and Key Contacts



Appendix 5: Essex Windscreen of Need and levels of intervention



Appendix 6: Safer recruitment and DBS checks – policy and procedures

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

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

Advertising:
When advertising roles, we will make clear:

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

Application forms:
Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity related to children (where the role involves this type of regulated activity).
- Include a link to our child and safeguarding policy and our policy on the engagement of ex-offenders.

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

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

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

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

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

Seeking references and checking employment history
When seeking references, we will:

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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.
- Ensure that at least one of the people on the interview panel has successfully completed Safer Recruitment training and that they pose relevant questions.

2: Pre-appointment vetting checks

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

New staff

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

- Verify their identity[8].
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and the recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their physical and mental fitness to carry out their work responsibilities, including validating qualifications experience and expertise as far as possible.
- Verify their right to work in the United Kingdom. We will keep a copy of this verification for the duration of the member of staff's employment and for at least 2 years afterwards.
- Ensure they are not subject to a prohibition order f they are employed to be a teacher.

[8] Where available, this will involve checking their name against their birth certificate. We will also ask to see a photographic ID, such as passport or driving licence, and a confirmation of address, such as bank statement or utility bill

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside the United Kingdom. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants.
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- Check that candidates taking up a management position[9] are not subject to a prohibition from management decision (section 128) made by the secretary of state.

For posts at Glebe Primary School or other posts within the Rayleigh Schools Trust that will involve them working at Glebe, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:
- Responsible, on a regular basis in a school 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 for an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

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

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

Agency and third-party staff

[9] Management positions include Headteachers, deputy Headteachers and assistant Headteachers, Governors and trustees.

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 that the checks have been carried out on.

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.

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

Trainee/Student Teachers

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

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

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

Volunteers:

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- For volunteers working at Glebe Primary School, ensure that appropriate checks are carried out to ensure that individual are not disqualified under the 2018 Childcare Disqualification

Regulations and Childcare Act 2006. Where we decide that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors, Trustees and Members:

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.

The Chair of the Board will have their DBS check countersigned by the secretary of state.

All Trustees, Members and Local Governors 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.
- Identity.
- Right to work in the United Kingdom.
- Other checks deemed necessary if they have lived or worked outside the United Kingdom.

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 schools in the Rayleigh Schools Trust make arrangements for pupils to be provided with care and accommodation by a host family to which they are not related, 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.

It is noted that schools in the Rayleigh Schools Trust do not currently operate any foreign exchanges. However, were this situation to change, we would operate in accordance with the above.

Appendix 7: Allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold:
This section applies to all case in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of Governors where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform the LADO.

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

Based on 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 within the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

If in doubt, the case manager will seek views from the school's personnel advisor and the LADO, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
- **False:** there is sufficient evidence to disprove the allegation.

- **Unsubstantiated:** there is insufficient evidence either to 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

There are two aspects to consider when an allegation is made:

- **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to children's social care as described in Section 8 of this policy.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

In the event that an allegation may meet the harms threshold (see above), the case manager will take the following steps:

- Conduct basic enquiries establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the LADO as soon as possible, but within one day of receiving the allegation. 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. (Where it is identified that a child has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency, the school will contact the police and/or children's social care following the procedure in Section 8 of this policy. In such cases, the case manager will notify the LADO as soon as possible after contacting the police / social care.)
- Inform the accused individual of the concerns or allegations and likely course of action after receiving guidance from the LADO (and police or children's social care, where necessary). Where the police and/or children's social care are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- Where appropriate, carefully consider whether suspension of the individual from the school is appropriate or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care as appropriate.
- **If suspension is considered necessary**, agree and record the rationale for this with the LADO. 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 LADO 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 LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care 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/carers of the child/children involved about the allegation as soon as possible if they don't already know (following agreement with children's social care and/or the police, if appropriate). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any abuse allegations against teachers (where this applies) while investigations are ongoing. Any parent/carer who wishes to have confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parent/carer of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

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

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

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

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome.
- The LGB (or representative thereof) will discuss with an agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out an investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as necessary.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account.

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

Timescales

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

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

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

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO 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.

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Confidentiality and information sharing

Schools in the Rayleigh Schools Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care, 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/carers of a child/children aware of the obligations with respect to confidentiality
- What, if any, information can reasonably be given to the wider community to reduce speculation.
- How to manage press interest if it arises.

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

We will retain all records until the individual reaches statutory retirement age, or for 10 years from the date of the allegation if that is longer.

References
When providing employer references, we will:

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

Learning Lessons:
After any cases where allegations are *substantiated*, the case manager will review the circumstances of the case with the LADO to determine whether there are any steps that improvements that could be made to the school / trust's procedures or practice to prevent similar events in the future.

This will include consideration of (as applicable):

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

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

Non-recent allegations:
Abuse can be reported, no matter how long ago it occurred.

We will report any non-recent allegations made by a child to the LADO.

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

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent, or other adult within or outside school
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

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

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

- Being overly friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring that staff are clear what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

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

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

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

Record-keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the LADO. The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.
- Retained at least until the individual leaves employment at the school.

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would normally be included in a reference, such as misconduct or poor performance.