

Child protection and safeguarding policy (including safer recruitment, allegations against staff and low-level concerns)

Crowcroft Park Primary School



Approved by:	Charlotte Flower (COG)	Date: December 2023
Last reviewed on:	October 2023	
Next review due by:	October 2024	

SAFEGUARDING POLICY

Crowcroft Park Primary school
<p>The Headteacher who has the ultimate responsibility for safeguarding is Juliet Francis</p> <p>In her absence, the authorised member of staff is Catherine Daly</p>

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Safeguarding Supervision	Juliet Francis	0161 224 5914
Designated safeguarding lead (DSL)	Catherine Daly	0161 224 5914
Deputy DSL	Alison Mottram	0161 224 5914
Local authority designated officer (LADO)	Manchester City Council: Manchestersafeguardingpartnership.co.uk	0161 234 1214
Chair of governors	Charlotte Flower	0161 224 5914
Channel helpline		020 7340 7264

This policy will be reviewed annually unless an incident, or new legislation or guidance, suggests the need for an interim review.

The effectiveness of our safeguarding arrangements are monitored by SLT and the Governing Body through, safeguarding supervision, a culture of professional challenge within the safeguarding team and regular reports to governors.

Review Date	Changes made	By whom
2/10/2023	Policy created	Catherine Daly

Ratification by Governing Body

Academic year	Date of ratification	Chair of Governors
2023-2024	December 2023	Charlotte Flower

Summary of Safeguarding Procedures

All staff, volunteers and visitors have a duty to ensure any concerns about the welfare and safety of children are addressed quickly and should not assume that someone else will take action. All adults in school must adhere to the ethos of 'it could happen here'.

Our procedure if there is a concern about child welfare or safeguarding is: -

- Record your concern factually on CPOMS.
- The DSL will investigate and decide on appropriate action, record action taken and decision making process on CPOMS.

If a child is in immediate danger:

- Contact children's social care and the police if needed on 999
- Don't delay to wait to speak to our DSL – but tell them as soon as possible.
- Early Help Hubs: North 0161 234 1973, Central 0161 234 1975, South 0161 234 1977
- Social Care Advice & Guidance Service: 0161 234 5001
- Complex Safeguarding Hub Advice Line: 0161 226 4196
- MCC Safeguarding in Education Team: 0161 245 7171

Our procedure if there is an allegation that an adult has harmed a child, or that a child is a risk from a named adult is:

- Report the concern to the head teacher unless the concern relates to the head teacher, in which case it should be reported to the chair of governors.
- Crowcroft | Park Primary School follows the government guidance 'Keeping Children Safe in Education' September 2023, when dealing with allegations made against staff and volunteers. All allegations made against a member of staff will be dealt with quickly and fairly and in a way that provides effective protection for the child whilst at the same time providing support for the person against whom the allegation is made.. The allegation will be shared with Manchester LA Designated Officer (LADO)
- Manchester LADO: 0161 234 1214
- Chair of Governors Mrs Charlotte Flower 0161 224 5914

Our procedure for whistleblowing if there is an urgent concern about child welfare or safeguarding that cannot be dealt with through our usual systems is: -

Staff, volunteers and visitors should report their concern to the head teacher. If the concern is about the head teacher, or it is believed they may be involved in the wrongdoing in some way, they should report their concern to the chair of governors.

NSPCC Whistleblowing Helpline: 0800 028 0285 or email help@nspcc.org.uk .

Our procedure for investigating and dealing with any complaints or concerns about our safeguarding practice that are brought to our attention is detailed in our Complaints Policy.

Additionally, we will co-operate with officers from the Education Department if they are aware of concerns which have been raised with Ofsted, the Regional Commissioner or the DfE.

CONTENTS: -

- 1. Introduction**
- 2. Roles & Responsibilities**
- 3. Training & Awareness Raising**
- 4. Safeguarding/Child Protection Policy & Procedures**
- 5. Case Management, Record Keeping & Multi-agency Working**
- 6. The Curriculum**
- 7. Online Safety**
- 8. Safer Recruitment**
- 9. Safety On & Off-Site**
- 10 Complex Safeguarding**
- 11. Appendices**
 - A - Statutory guidance
 - B - Non-statutory guidance
 - C - MCC, MSP & GM Policies, Procedures & Guidance
 - D - Links to other relevant school policies
 - E – Links to other relevant MCC policies
 - F – Abbreviations
 - G – Managing Allegations against staff including Low Level Concerns Policy

Please refer to Part 1 & Annex A and Annex B of 'Keeping Children Safe in Education (KCSIE), September 2023 [KCSIE 2023](#)

1. INTRODUCTION

Through this policy we aim to create and maintain a safe learning environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously.

This policy has been developed to ensure that all adults in our school, including regular staff, supply staff, volunteers, visitors and contractors are working together to safeguard and promote the welfare of children and young people and to identify and address any safeguarding concerns and to ensure consistent good practice.

Our approach is child-centred.

‘Safeguarding and promoting the welfare 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 their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.’ (KCSiE, Part 1.2)

See KCSiE Part 1, Part 5 & Annexes A and B for definitions and further information about: -

- Abuse & Neglect - including physical, emotional & sexual abuse and neglect
- Channel
- Child Abduction and Community Safety Incidents
- Child on Child Abuse – including sexual harassment, upskirting & sharing of nude and semi-nude images
- Child Criminal Exploitation
- Child Sexual Exploitation
- Children and the Court System
- Children Missing from Education
- Children who are lesbian, gay, bi or trans (LGBT)
- Children with Family Members in Prison
- County Lines
- Cybercrime
- Domestic Abuse
- Early Help
- Elective Home Education
- Homelessness
- Human Rights Act, Equality Act 2010 & Public Sector Equality Duty
- Looked After Children and children open to or who have been open to a Social Worker
- Mental Health
- Modern Slavery & the National Referral Mechanism

- Online Safety, including Education at Home
- Prevent Duty
- Preventing Radicalisation
- Serious Violence
- Sexual Violence and Sexual Harassment between children in schools and colleges
- So-called 'Honour-Based Abuse' including Female Genital Mutilation & Forced Marriage & Breast Ironing

Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures. The aims of this policy are in accordance with both our Mission Statement and our Equal Opportunities Policy, and it is an integral part of all of our activities and functions.

Safeguarding is our main priority at Crowcroft Park Primary School and is the responsibility of everyone in school. Child protection and safeguarding are at the forefront of, and underpin, all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at heart.

- 1.1 Under the Education Act 2002, schools/settings/colleges have a duty to safeguard and promote the welfare of their pupils and are committed to the guidance set out in 'Working Together to Safeguard Children 2018' (in process of review) and 'KCSiE 2023'. Our policy ensures that we comply with our Statutory Duties (Appendices A & B)
- 1.2 Our policy takes account of non-statutory guidance issued by the DfE and other relevant organisations (Appendix C) in addition to guidance issued by the Greater Manchester Combined Authority, the Manchester Safeguarding Partnership (MSP) and Manchester Local Authority, especially Education, Children's Services and Community Safety (MCC)
- 1.3 Our policy ensures that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take action to address them and that we comply with local policies, procedures and arrangements (Appendix E)
- 1.4 Our policy complements and supports other relevant school policies (Appendix D).
- 1.5 Our policy is regularly reviewed and we are responsive to new guidance and legislation and to promoting the safety of our staff and pupils in crisis situations.

2. ROLES & RESPONSIBILITIES

LEADERSHIP & MANAGEMENT

2.1 OUR GOVERNING BODY

Our Governing Body have a strategic leadership responsibility for our school's safeguarding arrangements and **will** ensure that they comply with their duties under legislation. They **will** have regard to KCSiE 2023, ensuring policies, procedures and training in our school are effective and comply with the law at all times.

Our Governing Body are fully aware of our role in multi-agency safeguarding arrangements, of Manchester Safeguarding Partnership (MSP) arrangements and of the Child Death Review partnership arrangements and will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

The Governing Body will ensure that: -

- All members of the Governing Body have read the most recent publication of Keeping Children Safe in Education in its entirety
- All members of the Governing Body have received appropriate training to enable them to provide strategic challenge and assure themselves that there is a robust whole school approach to safeguarding (KCSiE Part 2.81, 2.95-97)
- A named member is identified as the designated governor for Safeguarding.
- Governors facilitate a whole school approach to safeguarding and that all systems, processes and policies operate with the best interests of the child at heart.
- Where there is a safeguarding concern, they and school/college leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- The systems in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. 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:
 - Teach children, through assemblies and PSHE lessons, how to report their concerns to a trusted adult in school, either in person or by using a worry box.
 - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

- Policies and procedures allow for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- The school has a Behaviour Policy which includes measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying.
- Child protection files are maintained as required
- More than one emergency number is held on file for each pupil/student
- The identified governor will provide the governing body with appropriate information about safeguarding and will liaise with the designated member of staff.
- Our safeguarding policy and our staff Code of Conduct are reviewed at least annually, and staff are given opportunities to contribute to and shape our safeguarding arrangements and policies. Addenda or appendices may be added during periods of crisis to reflect changes of circumstance.
- We operate safer recruitment and selection practices in accordance with Part 3 of KCSiE.
- We have procedures in place for dealing with allegations of abuse against members of staff, including supply teachers, volunteers and contractors and these are in line with KCSiE and Local Authority procedures. We will work with the LADO and other relevant agencies to support any investigations.
- All staff and volunteers who have regular contact with children and young people and contractors who are in contact with children and young people receive appropriate training and information about the safeguarding processes.
- There is appropriate challenge and quality assurance of the safeguarding policies and procedures through regular safeguarding through regular safeguarding supervision.
- Our governors regularly review the effectiveness of online safety arrangements, including filters and monitoring, preparation for any online challenges or hoaxes and information shared with parents.

2.2 OUR HEADTEACHER

Our Headteacher will ensure that the policies and procedures, adopted by the governing body or proprietor particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.

Our headteacher is fully aware of our role in multi-agency safeguarding arrangements, of Manchester Safeguarding Partnership (MSP) arrangements and of the Child Death Review partnership arrangements. We will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, identifying and responding to their needs.

‘Schools and colleges should work with local authority children’s social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans’. (KCSiE 2.113)

‘All schools and colleges should allow access for children’s social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.’ (KCSiE, 2.114)

Our Headteacher is fully aware of statutory guidance in KCSiE and will ensure that:-

- The policies and procedures adopted by the Governing Body to safeguard and promote the welfare of pupils are fully implemented and followed by all staff, including supply teachers and volunteers and that they are regularly updated in response to local practice or national changes in legislation.
- All staff including supply teachers, volunteers, visitors and contractors understand and comply with our Code of Conduct.
- We evaluate our safeguarding policies & procedures at least on an annual basis and return our completed Safeguarding Self Evaluation (SEF) using the S175 online tool to the LA as requested (bi-annually).
- We share the Safeguarding Self Evaluation and Action Plan with governors at least annually.
- We work with the LA to ensure that our policies and procedures are in line with DFE and LA guidance.
- A senior member of staff, known as the DSL, is appointed with a clear job description. They have lead responsibility for Child Protection and Safeguarding and receive appropriate on-going training, supervision and support as well as sufficient time and resources to enable them to discharge their responsibilities.
- Parents/carers are aware of and understand our responsibilities to promote the safety and welfare of our pupils by making our statutory obligations clear.
- The Safeguarding and Child Protection policy is available on our website.
- Child friendly procedures to raise a concern/make a disclosure have been developed and are accessible to all children. Children are taught how report their concerns to a trusted adult through PSHE lessons, child-friendly posters and assemblies. Worry boxes are available in classrooms and communal areas.
- We co-operate fully with MCC and MSP multi-agency safeguarding procedures and arrangements are in place to monitor the quality of referrals and interventions and the processes for escalation of concerns. A timetable for staff ‘on duty’ is in place for school holidays.

- We create a culture whereby all staff, volunteers and visitors feel confident and have knowledge of how to raise a concern about poor or unsafe practice in regard to the safeguarding and welfare of the children and young people and such concerns are addressed sensitively and effectively.
- We have systems in place to ensure that any staff who are carrying out both regulated activities and other roles commissioned from external agencies/ organisations have been DBS checked and their employing organisations have safeguarding policies in place, including safer recruitment and annual safeguarding training appropriate to roles and we are compliant with legislation relevant to our setting.
- We ensure a risk assessment takes place to establish that the appropriate checks take place on volunteers.
- We have appropriate procedures to ensure that there is no risk to children from visitors and we exercise diligence and prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise pupils and staff.
- There are suitable arrangements for visitors coming onto the premises which may include an assessment of the educational value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

2.3 OUR DESIGNATED SAFEGUARDING LEAD (DSL)

The DSL is a member of our Senior Leadership Team and has a specific responsibility for championing the importance of safeguarding and promoting the welfare of children and young people. They take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. Some activities may be delegated as appropriate to a DDSL but they take the ultimate lead for child protection. (DDSL/s are trained to the same standard as the DSL).

The DSL will:

- Act as the first point of contact with regards to all safeguarding matters.
- Encourage a culture of listening to children and taking account of their wishes and feeling, and also understand the difficulties some children may have in approaching staff about their circumstances
- Work closely with the school's lead for mental health
- Help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns.
- Attend specialist DSL training every two years.

- Keep up to date with changes in local policy and procedures and be aware of any guidance issued by the DfE, MSP and LA concerning Safeguarding, e.g., through DSL Networks, Safeguarding Newsletters and Circular Letters
- Provide/commission support and training for staff and volunteers both through internal and external training.
- Liaise with the three safeguarding partners and work with other agencies in line with 'Working Together to Safeguard Children'
- Ensure that all referrals made to Children's Services are effective and in line with MSP procedures, and follow escalation process if necessary.
- Understand the assessment process for providing early help
- Have a working knowledge of how local authorities conduct a child protection case conference and review conference, and be able to attend and contribute to these effectively.
- Ensure that all staff with specific responsibility for safeguarding children, including the named DSL, receive the appropriate funding, training, resources and support needed to undertake this role.
- Know when to call the police if a crime may have been committed following the National Police Chiefs' Guidance (Annex C.p 165)
- Be aware of the requirement for children investigated by the police to be supported by an appropriate adult (PACE Code C 2019). (Annex C, p165)
- Refer cases to the Disclosure and Barring Service where a person is dismissed or has left due to risk/harm to a child.
- Ensure that all staff and volunteers understand and are aware of our reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Create and maintain child protection files and keep them up to date.
- Keep information confidential and store securely with a separate file for each child on CPOMS.
- Help promote educational outcomes for vulnerable children, including those with, or who have had, a social worker, in conjunction with other appropriate colleagues (KCSiE, 191-196)
- Share and transfer safeguarding and child protection information as appropriate. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:
 - **5 days** for an in-year transfer, or within
 - **The first 5 days** of the start of a new term

- Always be available during school hours during term time, and at other times as designated by the Headteacher. A timetable for staff 'on duty' is in place for school holidays.
- Understand and support the school/college with regards to the requirements of the Prevent Duty and be able to provide advice and support to staff on protecting children from risk of radicalisation
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Understand the lasting impact that adversity and trauma can have on children and young people
- Ensure the child protection policy is available publicly and parents/carers are made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school/college in this. The policy is available on the school's website. Unless children will be at significant risk of harm, consent will be sought from Parents/Carers before referrals are made.
- Activate the escalation process where plans, partners or processes are not improving the situation or outcome for a child

2.4 ALL STAFF

All staff in the school, including supply staff and volunteers have responsibility for safeguarding, according to their roles and under the guidance of the DSL.

All staff will:-

- Follow our agreed Code of Conduct and 'Safer Working Practices' guidance
- Read Part One/Annex A/Annex B of KCSiE 2023 as directed by senior leaders and appropriate to individual roles.
- Attend training sessions/briefings as required to ensure that they are aware of the signs of Abuse, Neglect, Complex Safeguarding concerns and key LA approaches including Early Help, Signs of Safety, Safe & Together and ensuring that the voices of children are listened to and taken account of.
- Attend training sessions/briefings as required to ensure that they follow relevant policies e.g. Behaviour Management Policy
- Provide a safe environment where children can learn
- Be aware of specific vulnerabilities of some children, including those with poor attendance and those with a Social Worker.
- Understand the concept of 'it could happen here' in respect of child sexual violence or sexual harassment and be proactive in response to a whole school approach to the issue
- Be approachable to children and respond appropriately to any disclosures

- Be aware that there are a range of reasons why some children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, be professionally curious and actively build trusted relationships which facilitate communication.
- Never promise a child that they will not tell anyone about an allegation, as this may not ultimately be in the best interest of the child
- Know what to do if they have a concern and follow our agreed procedures for recording concerns, sharing information and making referrals
- Attend multi-agency meetings as required, if appropriate to their role
- Be aware of the local early help processes and understand their role in it
- Contribute to the teaching of safeguarding in the curriculum as required, if appropriate to their role
- Provide targeted support for individual and groups of children as required, if appropriate to their role
- Teaching staff have additional statutory duties, including to report any cases of known or suspected Female Genital Mutilation.

3. TRAINING AND AWARENESS RAISING

- 3.1 In accordance with KCSiE 2023, all new staff and regular volunteers will receive appropriate safeguarding information during induction (including online safety and their responsibilities in relation to filtering and monitoring) and be made aware of the systems within the school which support safeguarding e.g. the Behaviour Policy
- 3.2 All staff must ensure that they have read and understood KCSiE: Part One. A signed record to say that staff have read and understood this is kept in the leadership office.
- 3.3 All staff will receive regular child protection training at least every 2 years and at least an annual update which includes basic safeguarding information about our policies and procedures, signs and symptoms of abuse (emotional and physical), indicators of vulnerability to exploitation and radicalisation, how to manage a disclosure from a child as well as when and how to record a concern about the welfare of a child, with regular updates in relation to local and national changes.
- 3.4 All staff members will receive regular safeguarding and child protection training and updates, including online safety and their role and responsibility in relation to filtering and monitoring as required, providing them with relevant skills and knowledge to safeguard children effectively. Half-termly safeguarding briefings are shared and staff meetings are held to deliver training.

- 3.5 To recognise the expertise built within staff by training and managing concerns on a daily basis, staff will be provided with the opportunity to contribute to and shape safeguarding arrangements and the child protection policy by providing feedback on systems in place.
- 3.6 All interview panels will include at least one member that has completed up to date Safer Recruitment training within the last 3 years.
- 3.7 All staff need to understand the impact mental health problems may have on all aspects of safeguarding including the relevance of Adverse Childhood Experiences (ACEs) and the impact of trauma on children and young people and this is included in our training programme.

4. SAFEGUARDING/CHILD PROTECTION POLICY & PROCEDURES

4.1 PUPIL VOICE

Children are encouraged to contribute to the development of policies and share their views. A number of child-friendly documents have been developed e.g. acceptable use policy, behaviour policy.

4.2 POOR ATTENDANCE (references to 'absent' children throughout KCSiE 2023)
We adopt MCC Attendance Policy and Attendance Strategy and reflect these in our own policies. We attend targeted support meetings related to attendance when required.

- 4.2.1 We view poor attendance as a safeguarding issue and in accordance with our Attendance Policy, absences are rigorously pursued and recorded. This includes missing individual lessons, as well as being absent or late at Registration. Any concerning patterns are reviewed in partnership with the appropriate agencies, we take action to pursue and address all unauthorised absences in order to safeguard the welfare of children in our care.
- 4.2.2 Our Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important. In certain cases this may form part of an Early Help Assessment (EHA) or a Parenting Contract.
- 4.2.3 We implement the statutory and LA requirements in terms of monitoring and reporting children to the CME Team.
- 4.2.4 We will follow the Anxiety Based School Avoidance guidance (MCC, updated version May 2023) to assist with strategies for supporting children and young people experiencing anxiety to return to school.

- 4.2.5 We will alert the relevant team or authority if a new child who has been expected to attend, does not arrive on the due date.

4.3 ALTERNATIVE PROVISION (AP)

- 4.3.1 We will only place children in AP which is a registered provider and has been quality assured e.g. is on the MCC approved provider list or has been judged by Ofsted to be Good or better.
- 4.3.2. Children who require access to AP will have a personalised learning plan designed to meet their needs. Our DSL will work together with the DSL at the AP to ensure effective sharing of information and that any safeguarding concerns are followed up appropriately.

4.4 EXCLUSIONS

- 4.4.1. We comply with statutory regulations and with the LA Inclusion Policy
- 4.4.2. The DSL will be involved when a fixed term or permanent exclusion is being discussed and any safeguarding issues will be considered. If there is an open EH, CiN or CP, the EH Practitioner or Social Worker will be informed.
- 4.4.3 We will work with the MCC Weapon Carrying in Schools and Colleges guidance (Appendix C) to assist in decision making around exclusion and other responses to carrying or using weapons in school.
- 4.4.4 Where it is felt that a child or young person is likely to be permanently excluded a multi-agency assessment will be instigated to ensure that there is improved understanding of the needs of the young person and their family and that the key agencies are involved.

4.5 VULNERABLE GROUPS

- 4.5.1 We ensure that all key staff work together to safeguard vulnerable children. This includes those children causing concern but not yet reaching statutory intervention level as well as those children who are in receipt of statutory support. This takes place through regular safeguarding supervision meetings and staff training.
- 4.5.2 Any child may benefit from early help at times, but all staff will be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific needs
 - Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
 - Has a mental health need
 - Is a young carer
 - Is showing signs of being drawn in to anti-social or criminal behavior, including gang involvement and association with organised crime groups or county lines
 - Is frequently missing/goes missing from care or from home
 - Is at risk of modern slavery, trafficking, sexual or criminal exploitation
 - Is at risk of being radicalised or exploited
 - Has a family member in prison, or is affected by parental offending
 - Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - Is misusing drugs or alcohol themselves
 - Has returned home to their family from care
 - Is at risk of 'honour'- based abuse such as Female Genital Mutilation or Forced Marriage
 - Is a privately fostered child
 - Is persistently absent from education, including persistent absences for part of the school day
- Additionally, these children will also be considered
- International new arrival, refugee or asylum seeker
 - Looked after, previously looked after or under a special guardianship order.
 - Has or has had a social worker
 - LGBT children (KCSiE, Part 2:203-205)
 - Has the potential for adultification

4.5.3. Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. All staff are aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:-

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs and

- Communication barriers and difficulties in managing or reporting these challenges.
(KCSiE, Part 2:199)

4.5.4 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 have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. (KCSiE, Part 2:180-186)

4.5.5. We ensure that staff consider the context in which incidents occur and whether wider environmental factors (extra-familial harm) are present in a child's life that are a threat to their safety and/or welfare.

4.5.6. We ensure that appropriate staff have the information they need in relation to a child's looked after legal status and regarding a child who was previously looked after. We work with relevant social workers and the Virtual School (KCSiE, 187-196)

4.5.7 Where children have or have had a social worker, we will work alongside the social worker to ensure there is a clear education focus in the Plan for the child.

4.6 CHILD ON CHILD ABUSE (KCSiE, Part 5 & Part2,156)

4.6.1 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 recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

4.6.2 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 and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will complete an AIMS (assessment, intervention, moving on) assessment together with a support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact and SEMH outreach and child and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal 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.

4.6.5 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:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- 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 the victim, alleged perpetrator(s) and any witnesses are not bullied 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 maintain an attitude of “it could happen 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 might 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 a peer 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 a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - 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

4.6.6 The DSL will take the lead role 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 our school from coming to its own conclusion about what happened and imposing a penalty 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 local authority children’s social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

4.6.7 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.

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 involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. 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 most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the 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.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS.

Curriculum coverage

Pupils are taught, in an age appropriate way, about the issues surrounding the sharing of nudes and semi-nudes as part of our Personal Social and Health education and computing programmes. 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

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

4.7 ELECTIVE HOME EDUCATION

- 4.7.1 We understand the variety of reasons why some parents/carers would wish to home educate their child/ren and support this where the child's best education is at the heart of the decision.
- 4.7.2 We also understand that by being educated at home, some children are less visible to the services that are there to keep them safe and supported in line with their needs
- 4.7.3 If a parent/carer informs us of their **intention** to remove their child/ren from school, we will aim to co-ordinate a meeting between ourselves, parents/carers (and other key professionals if relevant) to ensure that the best interests of the child have been considered, especially if the child has SEND, is vulnerable or has a social worker, **before** the final **decision** is made.
- 4.7.4 We will inform Manchester LA of all deletions from the admission register when a child is taken off-roll and we understand that a child may be removed from roll as soon as the parent has informed us of their decision.
- 4.7.5 We are familiar with the guidance from DfE outlining the roles and responsibilities of the LA in relation to Elective Home Education

4.8 COMMUNITY SAFETY

4.8.1 Serious violence

We are aware of the indicators and risk factors which may signal that children are at risk from, or are involved with, serious violent crime.

- 4.8.2 We update our awareness training for staff based on new information regarding trends, modes of operation and language/slang when provided by partner agencies.

4.8.3 Child abduction and community safety incidents

We will support children by building on their confidence and ability to deal with challenging situations to enable them to keep themselves safe. Our

PSHE curriculum supports develops children's knowledge and skills about how to keep themselves safe.

- 4.8.4** Our response to children carrying knives or other weapons in school and in situations out of school is aligned to the Manchester Knife and Weapon Carrying in Schools and Colleges Guidance (Knife Crime Protocol) in which we take a holistic and measured approach on a case-by-case basis to such incidents in and out of school.

5 . CASE MANAGEMENT, RECORD KEEPING & MULTI-AGENCY WORKING

5.1 KEEPING RECORDS

- 5.1.1 We keep and maintain up to date information on children on the school roll including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies. The record will also include a chronology of any other significant event in a child's life and up to date contact details for adults who have day to day care of the child. We use CPOMS to log all safeguarding concerns and all historic information for children on role is available on CPOMS.
- 5.1.2 We keep copies of all referrals to Children and Families Services, the Early Help Hub and any other agencies related to safeguarding children.
- 5.1.3 We keep our safeguarding records secure.
- 5.1.4 We send a pupil's child protection or safeguarding file separately from the main file to a new establishment if they leave as soon as possible. We keep a copy of the file in accordance with our records policy and statutory and LA Guidance (See Appendices A, B & D).

5.2 RECORDING AND REPORTING CONCERNS

- 5.2.1 All staff, volunteers and visitors have a responsibility to report any concerns about the welfare and safety of a child and all such concerns must be taken seriously (Appendix A). If a concern arises all staff, volunteers and visitors must:
- Record the concern factually on CPOMS. This should be done as soon as possible and must be done on the same school day as the incident/cause for concern.

5.3 WORKING WITH PARENTS/CARERS

- 5.3.1 Our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers and would expect them to provide up-to-date contact details, including at least 2 emergency contacts.
- 5.3.2 In most cases parents/carers will be informed when concerns are raised about the safety and welfare of their child and given the opportunity to address any concerns raised.
- 5.3.3 We aim to engage with parents/carers through the LA Early Help processes, including holding strength-based conversations.
- 5.3.4 We will inform, and gain consent from parents/carers if possible, if a referral is to be made to Children's Social Care or any other agency **unless it is believed that by doing so would put the child at risk** e.g. in cases of suspected sexual abuse. We will record the reasons if consent is not gained.
- 5.3.5 In such cases the DSL or Headteacher will seek advice from Children's Social Care AGS.

5.4 MULTI-AGENCY WORKING

- 5.4.1 We will develop effective links with other relevant agencies and co-operate as required with any enquiries regarding child protection issues.
- 5.4.2 We will develop effective links with the Early Help Hubs and carry out an Early Help Assessments (EHA), as appropriate.
- 5.4.3 We will notify the named Social Worker if:
 - A child subject to a child protection plan is at risk of permanent exclusion
 - There is an unexplained absence of a child who is subject to a child protection plan
 - It has been agreed as part of any child protection plan or core group plan.
 - We receive an Operation Encompass notification and believe the social worker may not be aware of the circumstances
- 5.4.4. We will regularly review concerns if necessary, as detailed in KCSiE and will follow LA and MSP procedures if there is a need to re-refer or

to escalate.

5.5 CONFIDENTIALITY & INFORMATION SHARING

- 5.5.1 Staff will ensure that confidentiality protocols are followed and under no circumstances will they disclose any information about children outside of their professional role.
- 5.5.2 Information about children will only be shared with other members of staff on a need-to-know basis
- 5.5.3 All staff and volunteers understand that they have a professional responsibility to share information with other agencies, in the best interests of the child's safety, welfare and educational outcomes. This is a matter of routine.
- 5.5.4 We have arrangements in place that set out clearly the process and principles for sharing information within school and with the three safeguarding partners, other organisations, agencies and practitioners as required. This includes an agreed rationale for gaining consent, when and what to share, when and what not to share and systems for recording these decisions.
- 5.5.5 We understand that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. (KCSiE Part 2:115-123)

5.6 CHILD PROTECTION (CP), CHILD IN NEED (CiN) & TEAM AROUND THE CHILD/FAMILY MEETINGS AND CONFERENCES

- 5.6.1 A child protection conference will be held by Social Care if it is considered that the child is suffering or at risk of significant harm.
- 5.6.2 We will attend and contribute to initial and review CP conferences, CiN conferences and relevant multi-agency meetings, including core groups.
- 5.6.3 Members of staff who are asked to attend a child protection conference or other core group meetings (either in person or virtually) about an individual pupil/family will need to have as much relevant updated information about the child as possible and will send a report, using the most up to date proforma to the Chair within the required timescales, at least 48 hours before the meeting.

5.6.4 Our reports will always include the voice of the child, which is especially important where there may be barriers to communication.

5.6.2 We will aim to discuss and share reports with the parents/carers before the conference.

5.6.3 All relevant staff will be confident in using the tools which are part of the Signs of Safety approach, including refreshed and updated versions

5.7 CONCERNS/DISCLOSURES BY CHILDREN, STAFF & VOLUNTEERS

5.7.1 Any concern, disclosure or expression of disquiet made by a child will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.

5.7.2 All staff and volunteers must be clear with children that they cannot promise to keep secrets.

5.7.3 We will make sure that the child or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint.

5.7.4 We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

5.8 LEARNING FROM SERIOUS CASES

MSP will always undertake a child practice review (CPR) previously called a serious case review (SCR) when a child dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death. The purpose of the CPR/SCR is to:

- Find out if there are any lessons to be learnt from the case about how local professionals and agencies work together to safeguard and promote the welfare of children and young people
- Identify what those lessons are, how they will be acted on and what is expected to change as a result of the serious case review.
- Improve inter-agency working to better safeguard and promote the welfare of children and young people

If required, we will provide an individual management report for a CPR/SCR and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.

Our DSL will keep up to date with the findings from CPR/SCR and other learning reviews nationally and in Manchester, share the learning and review our safeguarding procedures if relevant.

6. THE CURRICULUM

We are committed to promoting emotional health and wellbeing and to supporting the development of the skills needed to help keep children safe and healthy. This will include face to face teaching, blended learning and online learning as needed in response to any crisis situation that may arise.

- 6.1 All children have access to an appropriate curriculum, differentiated to meet their needs. They are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote the fundamental British values of tolerance, respect and empathy for others.
- 6.2. This enables them to develop the necessary skills to build self-esteem, respect others, support those in need, resolve conflict without resorting to violence, question and challenge and make informed choices in later life.
- 6.3 Relationships Education, Relationships and Sex Education (RSE) and Personal Social and Health Education (PSHE) lessons will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, family patterns, religious beliefs and practices and human rights issues.
- 6.4 We take account of the latest advice and guidance provided to help address specific vulnerabilities and forms of grooming and exploitation e.g. Domestic Abuse, Child Sexual Exploitation, Peer on Peer/Child on Child Abuse, Radicalisation, 'Honour-based' Abuse, including Forced Marriage, Female Genital Mutilation & breast ironing, Modern Slavery and County Lines.
- 6.5 All children know that there are adults in our school/setting/college whom they can approach in confidence if they are in difficulty or feeling worried and that their concerns will be taken seriously and treated with respect.
- 6.6 Children are encouraged to contribute to the development of policies through pupil voice.

- 6.7 Children are taught about safeguarding including online safety and for some children, this will take a more personalised or contextualised approach, such as more vulnerable children, victims of abuse and some SEND children. (KCSiE Part 2,129)
- 6.8 We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life.
- 6.9 We have a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence or harassment

7 . ONLINE-SAFETY (KCSiE, Part 2, 135-148)

- 7.1 Online safety is a safeguarding issue and we understand that children must be safeguarded from potentially harmful and inappropriate online material. Our whole school/college approach empowers us to protect and educate pupils/students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate. The purpose of Internet use in our school/setting/college is to help raise educational standards, promote pupil achievement, and support the professional work of staff as well as enhance our management information and business administration.
- 7.2 The checklist to ensure compliance with Filtering and Monitoring standards is included as Appendix B
- 7.3 We consider the 4C areas of risk to inform our online safety policy and ensure this is a running and interrelated theme when developing other relevant policies and procedures.
- 7.4 The Internet is an essential element in 21st century life for education, business and social interaction and we have a duty to provide children with quality access to it as part of their learning experience.
- 7.5 Our policy on the use of children's personal mobile phones and smart technology is clearly outlined in our acceptable use policy but in summary, we
- 7.6 We will ensure that appropriate filtering methods (without 'over-blocking') are in place to ensure that pupils are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material.

- 7.6 We ensure our monitoring system responds quickly to incidents and they are escalated to those with a safeguarding responsibility
- 7.7 We use an appropriate level of security protection in order to safeguard our systems, staff and learners from evolving cyber-crime technologies and periodically review its effectiveness.
- 7.8 We will encourage children to use Social Media safely, including opportunities for them to think and discuss the issues and to check their sources of information. We will keep abreast of new developments that may potentially harm our children.
- 7.9 We have separate acceptable use policies (AUPs) for both staff and children. This covers the use of all technologies and platforms used, both on and offsite.
- 7.10 We work with parents to promote good practice in keeping children safe online, including to support their children learning at home.
- 7.11 We ensure that all staff adhere to safe and responsible online behaviours when providing home learning and communicating with families
- 7.13 As technology, and the risks and harms associated with it, evolve and change rapidly, we will carry out an annual review of our approach to online safety supported by an annual risk assessment that considers and reflects the risks our children face. (KCSiE Part 2, 135-148)

8. SAFER RECRUITMENT & SELECTION OF STAFF

- 8.1 Our recruitment and selection policies and processes adhere to the DfE guidance, KCSiE and the LA model policy for Safer Recruitment (Appendices A & D)
- 8.2 Our safeguarding culture and vigilance, in conjunction with our policies and processes, will deter and prevent people unsuitable to work with children from applying or securing employment or volunteering opportunities at our school/college. These measures are outlined below and expanded in our Safer Recruitment Policy.
- All those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training and at least

one of the persons who conducts an interview has completed safer recruitment training.

- Our job adverts will include safeguarding requirements and the schools /colleges commitment to safeguarding and promoting the welfare of children
- Our job adverts will make clear that safeguarding checks will be undertaken, including online checks for shortlisted candidates
- We understand the process around filtering offences
- Our application form will include the statement that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity.
- We do not accept CVs in place of an application form.
- Shortlisted applicants will be asked to complete a self -declaration of their criminal record or information that would make them unsuitable to work with children
- Applicants must sign a declaration confirming information given is true
- References are obtained by the school/college before interview and open references are not acceptable
- Our selection techniques are pre-arranged and questions structured to understand suitability, skills and motivation for the role
- We will investigate at interview if any concerns have come to light about the candidate through the self-declaration or online checks.
- We involve pupils/students in the process in a meaningful way
- All information in the decision-making process is recorded along with the decisions made
- Correct pre-employment checks are carried out and appropriately stored on the single central record
- We understand and complete appropriate processes to determine if there are any prohibitions, directions, sanctions disqualifications or restrictions related to the candidate
- We understand the check which needs to be made for individuals who have lived or worked outside the UK

- We adhere to duties which must be performed in relation to agency and third party staff, contractors, trainees or student teachers, visitors and volunteers
 - We remain vigilant about safeguarding beyond the recruitment process and ensure commitment is evident to the safety and welfare of our children as enshrined in our ethos
- 8.3 The Headteacher and Governing body will ensure that all external staff and volunteers, including out of hours organisations using our school site have been recruited safely, including DBS checks as appropriate.
- 8.4 The school maintains a single central record of all recruitment checks, updated and monitored at least termly, by senior leadership and governor.
- 8.5 Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.
- 8.6 Written notification will be requested from any agency or third party organisation used by us to confirm that the organisation has carried out the statutory recruitment checks.
- 8.7 We will not routinely keep copies of DBS certificates, either electronically or in paper files but if we have good reason to do so, these will not be kept for longer than six months
- 8.7 Risk assessments are carried out on all volunteer activities as required.

9. MANAGING ALLEGATIONS AND CONCERNS AGAINST STAFF, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS

- 9.1 We follow the DfE guidance KCSiE, Section 4, when dealing with allegations made against staff, supply staff, volunteers and contractors applying the appropriate level of concern criteria and managing accordingly
- 9.2 We follow the DfE guidance KCSiE, Section 4, when dealing with allegations made against staff, supply staff, volunteers and contractors applying the appropriate level of concern criteria and managing accordingly
- 9.3 We work closely with the police, children's social care and MCC LADO when a risk of harm is indicated

9.4 The welfare of the child/ren is paramount when considering an allegation and before contacting the LADO we make careful enquiries to help determine facts and foundation to the allegation, aware of not jeopardising any future police investigation

9.5 We consider allegations that may meet the harms threshold and those allegations/concerns that do not, referred to as 'low level concerns'.

9.6 The harms threshold indicates that a person would pose a risk of harm if they have-

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behavior that may have happened outside school, known as transferable risk)

9.7 Concerns that do not meet the harm threshold may include

- Suspicions or nagging doubts about a member of staff
- Complaints
- Disclosures made by child, parent/carer or another adult within or outside of school/college
- Inappropriate conduct outside of work
- Those raised during recruitment and vetting processes

9.8 Our open and transparent culture enables us to identify concerning, problematic or inappropriate behavior early thus minimising the risk of abuse

9.9 Although low level concerns may not meet the harm threshold, they are not insignificant.

9.10 All low level concerns are reported to the headteacher/principal and may also be self-referred (KCSiE provides further clarity on processes- 423-440)

9.11 Our Allegations and Low Level Concerns Policy (appendix G) details the processes and conclusion of low level concerns and guidance about including information in references.

- 9.12 All allegations made against a member of staff, including supply staff, volunteers, contractors or security staff working on site, will be dealt with quickly and fairly and in a way that provides effective protection for the child while at the same time providing support for the person against whom the allegation is made.
- 9.13 We ensure that all staff are aware of how to raise a concern, including anonymously as a whistleblower through regular safeguarding training in staff meetings and half-termly safeguarding briefings.
- 9.14 Historic allegations will be referred to the police.

10. SAFETY ON & OFF SITE

- 10.1 Our site is secure with safeguards in place to prevent any unauthorised access and also to prevent children leaving the site unsupervised.
- 10.2 We have good up to date knowledge of our local area and any safeguarding risks to the wider community.
- 10.3 All visitors, including visiting speakers, are subject to our safeguarding protocols while on site. We will undertake an assessment of the education value, age appropriateness and content of the visitor's itinerary.
- 10.4 Visitors who are in school in a professional capacity will have their ID checked and appropriate DBS check where required.
- 10.5 We will ensure that any contractor, or any employee of a contractor, who is to work in our school, has been subject to the appropriate level of DBS check. We are responsible for determining the appropriate level of supervision depending on the circumstances and set out our safeguarding requirements in any contacts between school and the contractor's organisation. We will always check the identities of contractors and their staff on arrival.
- 10.6 We operate a responsible booking protocol and will carry out appropriate checks on all organisations which request to hire our facilities.
- 10.7 When the school is let, if services or activities are provided by the governing body or proprietor, under the direct supervision or management of school/college staff, the school arrangements for child protection will apply.

- 10.8 When the school is let and services or activities are provided by another body, we seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and ensure there are arrangements in place to liaise with school/college on these matters where appropriate.
- 10.9 Should we receive an allegation relating to an incident that happened when an individual or organisation were using our premises for the purpose of running activities for children, we will follow our safeguarding policies and procedures including informing the LADO.
- 10.10 Safeguarding arrangements should be included in any lease or hire agreement as a condition of use and occupation of the school premises – failure to comply with this will lead to termination of the agreement.
- 10.11 We exercise due diligence to prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise pupils or staff.
- 10.12 We will ensure that any person supervising a child on a work-experience placement has been subject to the appropriate level of DBS check.
- 10.13 All school visits are fully risk-assessed and no child will be taken off-site without parental permission.
- 10.14 For international exchanges, we will liaise with our partner schools abroad to establish a shared understanding of the arrangements in place both before and during the visit. We will ensure we are satisfied that these are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. We may also feel it necessary to contact the relevant foreign embassy of High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside the UK.
- 10.15 We have a Health & Safety policy e.g. for contacting parents and for reporting to the emergency services, including police and hospitals.
- 10.16 We have read and considered the MCC/One Education Critical Incident guidance, the DfE Emergency planning and response for education, childcare and children's social care settings and School and College Security GOV.UK and we have a critical incident policy.

11 . COMPLEX SAFEGUARDING

Serious violence

- 11.1. We are aware of the indicators and risk factors which may signal that children are at risk from, or are involved with serious violent crime
- 11.2. We will support referrals to Engage panels by providing information about concerns and worries for children involved in ASB and on the edge of criminality, including whether interventions have already been put in place and their success or not.

Child Criminal Exploitation and Child Sexual Exploitation

- 11.2.1 Children's Social Care will refer cases of child exploitation, criminal or sexual, to the Complex Safeguarding Hub and we will contact the professionals' advice line for further support to hasten this process or seek guidance, as appropriate.
- 11.2.2 We understand that schools are one of many locations where children can be targeted and recruited into county lines and recognise additional specific indicators that may be present when a child is criminally exploited through involvement in county lines. (KCSiE, Annex B)
- 11.2.3 We are aware of the significantly low numbers of reported CCE/CSE cases for girls locally and remain vigilant in recognising the signs of involvement for both boys and girls
- 11.2.4 We are mindful of the language and descriptors used when discussing or referring CCE and CSE instances and avoid all victim blaming language.
- 11.2.5 We consider the use of the term 'gang' and only apply it to Organised Crime Gangs, not urban or street groups, although our children may perceive that they belong to, or associate with, a named 'gang'.
- 11.2.6 We will seek help, support or recommendations from statutory partners with finding suitable outside presenters to deliver awareness and resilience programmes to help our children make good choices in the near and long-term.
- 11.2.7 We are familiar with My Safety Planning approach for Child protection in extra-familial harm circumstances

APPENDICES

Our policy is based on the following legislation, national & local guidance/procedures and links to other relevant school policies

A.Legislation, Statutory Guidance & Ofsted Framework

- **Definitions of Abuse & Neglect from ‘Working Together to Safeguard Children’ (updated 2018)**

Significant Harm

The threshold that justifies compulsory intervention in family life and gives Local Authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm.

Physical Abuse

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 an illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. The activities may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

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

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

- Provide adequate food and clothing, shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caretakers).
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **'Keeping Children Safe in Education', September 2023**

Specific guidance for educational settings - relevant sections to be read and understood by all staff and volunteers as deemed appropriate. It signposts to key legislation as well as signposting to useful organisations and resources.

- Ofsted Section 5 Inspection Framework for Schools
- Inspecting Safeguarding in Early Years, Schools & Skills Settings'
- 'Working Together to Safeguard Children'
- Prevent Duty, Section 26 Counter Terrorism & Security Act
- FGM Duty, Multi-agency Statutory Guidance on FGM April 2016, Section 74 Serious Crime Act 2015
- Domestic Abuse Act 2021
- Serious Case Reviews & Domestic Homicide Reviews (SCRs & DHRs)
- DFE Statutory Policies for Schools
- DFE Children Missing Education, Stat Guidance
- DFE Designated Teacher for LAC Guidance
- DFE Supervision of Regulated Activity
- Alternative Provision, Stat guidance
- Teachers' Standards
- Governors' Handbook
- 'Listening to & involving children & young people', stat guidance
- Health & Safety Legislation
- Equality Act

- Filtering and Monitoring standards <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

B.Non-statutory Guidance

- DfE 'What to do if you are worried a child is being abused - Advice for practitioners'
- 'Safer Working Practices'
- DfE National Standards of Excellence for Headteachers,
- DfE 'Use of Reasonable Force in Schools',
- United Nations Convention on the Rights of the Child, Article 2,3 6 & 12
- NSPCC Whistleblowing Advice line
- DfE Sexual Violence and Sexual Harassment in Schools and Colleges advice
- DfE Promoting the education of children with a social worker -Virtual School Head role extension June 2021
- NSPCC 'When to call the police'

C.MCC, MSP & GM Policies, Procedures & Guidance

Links to:-

MSP Website:-

- MSP & GM Policies
- MSP Multi-agency Levels of Need & Response Framework,
- Safeguarding Concerns, Guidance & Proformas, including escalation process
- MSP LADO Referral Process
- MSP Learning From Serious Case Reviews
- MSP on Sexual Harassment
- GM Weapons Carrying Guidance
- SYV Protocol

Help & Support Manchester Website:-

- Early Help Strategy, Guidance, Assessments & Referrals
- Our Practice in Manchester website:-
- Signs of Safety Strategy, Guidance & Resources

MThrive

National Police Chiefs' Guidance

D.Links to Other Relevant School Policies

- Health and Safety
- Acceptable use
- Extended Schools Activities
- Behaviour
- Special Educational Needs
- Anti-bullying
- Code of Conduct

E.Links to Other Relevant MCC Education Department Policies/Guidance

Schools Hub

- 'Safeguarding' model policy & guidance
 - 'Safer Recruitment' model policy
 - Safeguarding Children with SEND
 - Manchester Governors' Handbook MCC
 - Attendance Guidance
 - CME Guidance
 - Inclusion Strategy
 - Anxiety Based School Avoidance Guidance
 - Weapon Carrying in Schools and Colleges Guidance
 - MCC Elective Home Education Policy
 - MCC Alternative Provision guidance and approved provider list
-
- UKIS Governors' Guidance for Online Safety

F. Abbreviations

- CiN Child in Need
- CP Child Protection
- CSC Children's Social Care
- DSL Designated Safeguarding Lead
- EH Early Help
- EHA Early Help Assessment
- GM Greater Manchester
- LADO Local Authority Designated Officer
- MASH Multi Agency Safeguarding Hub
- MCC Manchester City Council
- MSCB Manchester Safeguarding Children's Board
- SOS Signs of Safety

Appendix G

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates 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 of school

If we're 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 judgement.

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

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

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 the 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 designated officer at the local authority

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

- Suspicions or nagging doubts about a member of staff
- Inappropriate conduct outside of work
- issues raised during recruitment and vetting processes
- 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 staff are clear about 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 as per section 7.7 of this policy
- Empowering staff to self-refer
- 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 the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

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

Record keeping

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

Records will be:

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

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

References

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

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