



## CHILD PROTECTION & SAFEGUARDING POLICY

Version: Sept 2019

Status	Statutory
Responsible Management Committee (MC)	Well-being
Date last approved by MC	OCTOBER 2019
Responsible Person	Headteacher
To Review Date	SEPTEMBER 2020
Last Amended Date	SEPTEMBER 2019

### Child Protection Statement

The Herefordshire Pupil Referral Service (HPRS) is a child centred organisation and always works in the best interests of the child. We recognise our statutory responsibility to safeguard and promote the welfare of all children. All children regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. **Safeguarding is everyone's responsibility.**

We recognise that any child in a PRU has a heightened risk of safeguarding issues. Our children can be targeted and are more likely to be at risk of exploitation. Any of our children who are missing education or are on part time timetables are at increased risk of exploitation and other safeguarding concerns. All staff at HPRS must report any concerns, however small, to support the build-up of a picture of a child that may be at risk.

### Aims

- To provide a safe, healthy learning environment that allows all children to develop to their full potential.
- To ensure children know they can report concerns affecting their welfare and safety and know that their concerns are listened to seriously.
- To ensure our children know who the adults are in school that they can approach if they are worried or in difficulty or concerned about one of their peers.
- To ensure we equip children with the skills to keep themselves safe.
- To identify concerns about a child's welfare, and to initiate or take appropriate action to keep them safe.
- To promote partnership working with parents/carers and other agencies.
- To ensure safe recruiting practices are followed to check the suitability of staff and volunteers who work with our students.
- To provide all staff and volunteers with the necessary information to enable them to meet their child protection responsibilities.
- To provide ongoing training to ensure all staff know that they have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse and for staff to be aware of HPRS safeguarding procedures.
- To ensure all staff are equipped to deal with safeguarding concerns and attend regular safeguarding training.
- To ensure that fundamental British values are promoted and extremist views are challenged and children are kept safe from the risk of radicalisation.

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

## Legislation and statutory guidance

This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004 amendment, the Education Act 2011, and School Staffing regulations 2009, together with statutory guidance:

- Keeping Children Safe in Education, September 2019
- Working Together to Safeguard Children, March 2018
- Information sharing July 2018
- What to do if you're worried a child is being abused March 2015
- Governance Handbook
- Section 26 The Counter Terrorism and Security Act 2015 (Prevent and Channel Duty)
- Female Genital Mutilation Act 2003
- DCSF guidance Safeguarding Children and Safer Recruitment in Education (2011)
- Safeguarding vulnerable Groups Act 2006
- The Rehabilitation of Offenders Act 1974

**We comply with the guidance and the arrangements agreed and published by our 3 local safeguarding partners.** (See below)

## Local Safeguarding partners

We also work with the following 3 safeguarding partners;

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

We work together to:

- Provide a co-ordinated offer of early help where needs are identified
- Contribute to inter-agency plans to support children who are subject to child protection plans
- Allow access for children's social care to conduct section 17 or 47 assessments

## The definition of safeguarding can be summarised as:

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

We recognise that because of the day to day contact with children, HPRS staff are well placed to observe the outward signs of abuse. We, therefore, work hard to:

- Establish and maintain an environment in which children and parents feel secure, are encouraged to talk, and are listened to.
- Ensure that children know there are adults whom they can approach if they are worried.
- Include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse, bullying, discrimination or exploitation.
- Ensure that all staff are aware of the need to maintain appropriate and professional boundaries in their relationships with children and parents.

## Equality statement

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

We give special consideration to children who:

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

## Roles and Responsibilities

We recognise that child protection is the responsibility of all staff working within the HPRS. We will ensure that all parents are aware of our child protection and safeguarding policy through initial meetings with parents/carers of new students, through regular communication with all parents/ carers and on our website.

Within the HPRS there are designated members of staff with responsibility for child protection and safeguarding as follows:

<b>DSL</b>	James Bowdler Nick James-Williams
<b>DDSL</b>	Sandie Stephens Sam Morris Jenny Hammond Amanda Pandeli
<b>Management Committee</b>	Jonathan Nicholas
<b>LAC and previously LAC Lead</b>	James Bowdler
<b>Prevent Lead</b>	Kimberly Harley

If a member of staff has concerns about the Headteacher they should take their concerns to Kimberly Harley or Jan Baker (Chair of the Management Committee)

## Responsibilities of the Designated Safeguarding Lead (DSL):

- Has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff and is a member of the Senior Leadership Team.
- Refers cases of suspected abuse or allegations to Social Care and liaison with other agencies where appropriate.
- Acts as a source of support, advice and expertise for staff within the HPRS.
- Ensures all staff have access to and understand the HPRS child protection and safeguarding policy.
- Updates the HPRS child protection and safeguarding policy annually.
- Is the designated person for Looked After Children and previously looked after children. As part of this role they will attend training and will work closely with the Virtual Headteacher and the child’s Social worker to ensure the child is kept safe.

## Responsibilities of the Deputy Designated Safeguarding Lead (DDSL):

- Is trained to the same level as the DSL.
- In the absence of the DDSL, carries out those functions necessary to ensure the ongoing safety and protection of children.
- In the event of the long term absence of the DSL, the deputy will assume all of the functions above.

## Management Committee responsibilities:

The HPRS Management Committee will ensure that:

- There is a regularly updated child protection and safeguarding policy and safeguarding procedures are in place.
- Safe recruitment procedures are in place and that all appropriate checks are carried out including statutory checks on the suitability of staff to work with children and disqualification by associated regulation.
- All staff undertake appropriate child protection training.
- There is a member of the Committee who will take lead responsibility for the organisation's child protection and safeguarding arrangements.
- There are procedures for dealing with allegations of abuse made against a member of staff or volunteer.

## Staff responsibilities:

Child Protection and safeguarding is the responsibility of all staff. It is the responsibility of every member of staff to refer any concerns about a child's safety and welfare to the DDSL or the DSL. Recognising child abuse is not easy, and it is not staff's responsibility to decide whether or not child abuse has taken place or if a child is at significant risk. Staff are advised to maintain an attitude of *'it could happen here'* where safeguarding is concerned. All staff have a responsibility to act in the interests of the child if they have a concern about a child's welfare or safety.

Safeguarding training will be delivered annually for all staff. If you do not attend the face to face training you MUST complete online training and log proof of training with the SCR.

**The relationships and associations that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, staff MUST speak to the DSL or Headteacher.**

## Children with special educational needs (SEN) and/or disabilities

We recognise that these pupils can face additional safeguarding challenges. These pupils are more prone to;

- Assumptions being made that possible indicators of abuse relate to the child's disability, without further exploration
- Peer isolation
- Being disproportionately more affected by issues such as bullying
- Communication barriers and difficulties in overcoming those

## Looked after children (LAC)

The most common reason for children becoming 'looked after' is as a result of abuse and/or neglect.

All staff therefore need to make sure that:

- You have the skills, knowledge and understanding needed to keep LAC and previously LAC safe
  - This includes information regarding the legal status and parental responsibility arrangements for the child
- You know who the designated teacher to promote the educational achievement of these children is.

- The DSL will have details of the child’s social worker and the name of the virtual school head in the authority that looks after the child.
- Any safeguarding concerns will be shared with the Virtual School to ensure LAC or previously LAC are safe.

## Confidentiality

HPRS has a separate data protection policy that covers our process and principles for sharing information within the service, and with the 3 safeguarding partners and other agencies as required.

Note:

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

**The Data Protection Act 2018 and GDPR do not prevent, or limit the sharing of information for the purposes of keeping children safe. This includes allowing staff to share information without consent.**

# CHILD PROTECTION & SAFEGUARDING PROCEDURES

All staff should report any child protection or safeguarding concerns to the DSL as soon as possible AND log their concern on MyConcern so there is a record in writing with a date stamp. If the DSL or DDSL are not available, you should speak to a member of the Senior Leadership Team.

Any verbal conversations should be recorded in writing immediately.

## IF YOU HAVE CONCERNS ABOUT A PUPIL;

- ACT IMMEDIATELY
- SPEAK TO THE DSL/DDSL OR MEMBER OF THE SLT AS SOON AS YOU CAN
- IF NO ONE IS AVAILABLE CALL MASH AND ASK FOR ADVICE

## IF YOU THINK A PUPIL IS IN IMMEDIATE DANGER;

- CONTACT MASH (01432 260800) OR THE POLICE IMMEDIATELY

## IF YOU HAVE CONCERNS ABOUT FEMALE GENITAL MUTILATION;

- CONTACT THE POLICE

**REMEMBER : Anyone can make a referral.**

## WHISTLE BLOWING

**Concerns about any staff member** posting a risk to a pupil should be reported to the Headteacher immediately

**Concerns about the Headteacher** should be reported to the Chair of Governors immediately

Concerns will be sent to the Local Authority Designated Officer (LADO)

See Whistle Blowing Policy

**Information concerning a disclosure MUST only be shared with those colleagues who NEED to know.**

## WHAT POOR PRACTICE LOOKS LIKE;

- Failing to act on the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to reassess concerns where the situation does not improve
- Not sharing information, or sharing it too slowly
- Not challenging those who aren't taking action

Further procedures are outlined below;

## WHAT TO DO IF A CHILD MAKES A DISCLOSURE:

- When a child chooses to disclose information no member of staff should ever give undertakings of confidentiality.
- It should be explained to the child how the information will be used and who will be told.
- The child should be reassured that their safety is paramount.
- Staff should not ask leading questions. The chief task at this stage is to:
  - **LISTEN** without interruption.
  - **RECORD** what the child is saying exactly, using their own words with the date and time.
  - **REPORT** the information in the first instance to the designated member of Staff for Child Protection and Safeguarding or their Deputy.
- Staff should be aware that the way in which they talk to a child could have an effect on the evidence that is put forward if there are subsequent criminal proceedings.
- Avoid asking leading questions or attempting to investigate the allegations of suspected abuse.

## **PROCEDURE FOLLOWING A DISCLOSURE OF SUSPECTED ABUSE OR IF YOU HAVE CONCERNS ABOUT A CHILD'S WELFARE:**

Anyone who receives a disclosure of abuse, an allegation of abuse or who suspects that abuse may have occurred MUST report it immediately to the DSL or the DDSL. No single member of staff can have a full picture of a pupil's circumstance. It is vital that everyone reports concerns and shares information. Every piece of information helps to build up a picture of a pupil and helps inform decision making. In their absence the matter should be brought to the attention of the Head Teacher or the most senior member of staff in school. This should be followed with a written record within 24 hours, using as far as possible the child's own words.

### **Information concerning a disclosure MUST only be shared with those colleagues who NEED to know.**

Teachers MUST personally report to the police a disclosure that Female Genital Mutilation (FGM) has been carried out, after informing the DSL.

- The Designated Member of Staff for Child Protection and Safeguarding will contact the relevant investigating agency and/or the police immediately if they believe a child is suffering or likely to suffer harm or is in immediate danger.
- A telephone referral will be confirmed by a referral form available from the Herefordshire Safeguarding Children's Board website: <http://hscb.herefordshire.gov.uk/>
- Where there is concern about a child or an immediate danger or risk of harm, log on MyConcern to ensure a full record and timeline is recorded.
- We will inform parents/carers of our actions unless it is our view that so doing could place a child at greater risk of harm.
- In cases of intra family abuse, parents should not be notified of the action that is being taken. Staff should not discuss the disclosure with them until advised to do so by Social Care. This ensures that Social Care or Police enquiries are not jeopardised.
- In cases of peer to peer abuse concerns will be reported to the DDSL or DSL. **Concerns may range from harassment or humiliation in person or online to sexual or physical abuse. All instances will be investigated and dealt with.**
- Staff should note that anybody can refer their concerns to children's social care directly

## **PROCEDURE FOLLOWING A PREVENT CONCERN**

Extremism and exposure to extremist materials and influences MUST BE REPORTED. If there is any suspicion that a child is at risk of radicalisation;

- Staff inform the DSL or the DDSL.
- The DDSL or DSL will refer to the Prevent Lead of HPRS.
- It will then be referred to the Prevent Co-ordinator for Herefordshire Council.
- We will follow the Channel Process (see Appendix). This process identifies and supports individuals at risk of being drawn into terrorism.

In the event of the DSL or DDSL is not available The Department for Education has a dedicated telephone helpline, 020 7340 7264 and email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk) for advice related to extremist activity.

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

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

## **PROCEDURE FOLLOWING A CHILD EXPLOITATION (CE) CONCERN**

We recognise that children attending a PRU can be targeted by individuals or gangs that intend to exploit them for criminal or sexual activity. If there is any suspicion that a child is at risk of exploitation;

- Staff to inform DSL or DDSL immediately
- Complete a CE assessment form
- Complete a soft intelligence form to share information with the police and safeguarding agencies.
- Discuss with MASH
- Complete a Multi-Agency Referral Form (MARF) or Early Help Assessment (EHA) as appropriate.
- Ensure MyConcern contains all concerns and forms completed
- DSL to monitor and escalate in accordance with evidence.

## **PROCEDURE FOLLOWING A PEER ON PEER ABUSE CONCERN**

Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". All peer-on-peer abuse is unacceptable and will be taken seriously. We recognise that there is a gender nature to peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, you need to recognise that this is not always the case. All peer-on-peer abuse is unacceptable and will be taken seriously.

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

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

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

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

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

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

## PROCEDURES FOR RESPONDING TO A SEXTING INCIDENT

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

### You must not:

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

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

### Initial review meeting by DSL

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

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

The DSL will make an immediate referral to police and/or MASH if:

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

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

### Further review by the DSL

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

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

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

### **Informing parents**

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

### **Referring to the police**

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

### **Recording incidents**

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

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our PSHE /ICT education programmes.

Teaching covers the following in relation to sexting:

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

Pupils also learn the strategies and skills needed to manage:

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

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

## **PROCEDURE FOR CHILDREN MISSING FROM EDUCATION**

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

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

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

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

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

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

## NOTIFYING PARENTS

Where appropriate, we will discuss any concerns about a pupil with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the MASH team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## STAFF MOBILE PHONES AND CAMERAS

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

Staff will not take pictures or recordings of pupils on their personal phones or cameras. HPRS devices ONLY will be used to taking pictures or video of pupils.

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

## SAFE PRACTICE AND AVOIDING ALLEGATIONS OF ABUSE

All staff are responsible for their own actions and behaviour to avoid conduct which could lead to any reasonable person to question their intentions.

- When staff have to work with an individual student the session must be conducted in a room with visual access, either a window or by leaving the door open.
- Staff must discuss any decision to visit or meet a student away from the Centre premises with their line manager.
- When a member of staff agrees to transport a child, wherever possible a second adult should accompany them. The child must travel in the back seat, wearing a seatbelt. The adult involved must either report to their line manager on their return to school or make a note of arrival & drop off time if it is the end of the school day.
- HPRS cameras are used to take photographs. **NB: Staff must not use their personal phones to take pictures or video recordings.**

## MANAGING ALLEGATIONS AGAINST STAFF OR VOLUNTEERS

HPRS believes that all staff and students are entitled to receive care and protection from harm. We will not accept inappropriate behaviour towards students or staff, and will ensure that any concerns or allegations are dealt with quickly, fairly and sensitively. The HPRS has a whistle blowing policy and clear procedures for managing allegations.

If staff have concerns about another staff member then this should be referred to the Head Teacher. Where there are concerns about the Head Teacher this should be referred to the Chair of the Management Committee. Contact details can be found at the end of this Procedure document.

Staff have a responsibility to report any concerns about the behaviour of a colleague to a member of senior leadership where it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 she/he is unsuitable to work with children.

#### **WHAT TO DO:**

- Take all safeguarding concerns seriously.
- Report to the most senior person not implicated in the allegation.
- Record in writing your concerns within 24 hours.
- Take advice from the Local Authority Designated Officer (LADO).
- Avoid investigating the issue yourself as this may interfere with future police or social care investigations.
- The member of staff concerned in the allegation should not be told until discussion with the LADO has taken place.
- If the member of staff is dismissed or removed for safeguarding reasons, a referral will be made to the Disclosure and Barring Service (DBS). This action will be agreed with the LADO.

Any staff disclosing information regarding inappropriate behaviour by colleagues will be listened to and supported.

#### **SAFER RECRUITMENT**

HPRS follow Safe recruitment processes which are clearly laid out in our Safer Recruitment Policy. DBS checks are carried out on all staff and will be updated on a three yearly cycle.

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

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

The Management Committee will also ensure that HPRS;

- Adheres to statutory responsibilities to check staff who work with children
- Takes proportionate decisions on whether to ask for any checks beyond what is required
- Makes sure volunteers are appropriately supervised
- Has written recruitment and selection policies and procedures in place

#### **NEW STAFF**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete.
- We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

## **AGENCY AND THIRD-PARTY STAFF**

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

## **CONTRACTORS**

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

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

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

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

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

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

## **GOVERNORS**

All members of the Management Committee will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

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

## **STAFF WORKING IN ALTERNATIVE PROVISION SETTINGS**

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

## ADULTS WHO SUPERVISE PUPILS ON WORK EXPERIENCE

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

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

## CHECKING THE IDENTITY AND SUITABILITY OF VISITORS

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

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

## RECORD KEEPING

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in MyConcern.

- All disclosures will be recorded as soon as possible after the conversation. Use statements and observations and not interpretations or assumptions.
- Do not destroy any original notes. They may be required by a court.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Draw a diagram to indicate the position of any injuries.
- All child protection records are kept secure and confidential.
- The designated child protection and safeguarding officer will be responsible for maintaining and monitoring child protection records.
- The designated child protection and safeguarding officer will ensure the safe/secure transfer of a student's child protection records when a child moves to a new educational setting.
- Child protection files will only be accessed by a limited number of staff as deemed appropriate within each Centre.
- We will hold records in line with our records retention schedule.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left HPRS.
- If a child for whom HPRS has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are

involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

## **STAFF TRAINING**

The DDSL and DSL will receive formal safeguarding training every two years. They will also attend Prevent awareness training. In addition to this training, they will update their knowledge and skills by reading e-bulletins and attending safeguarding meetings.

- Up to date records of all staff safeguarding training will be kept.
- All staff will be introduced to the Safeguarding Policy on induction.
- Appropriate staff will be trained in specific areas of Safeguarding to ensure all aspects are fully represented, including, Recruitment, Record Keeping, CSE, FGM, Peer to Peer Abuse, Early Help eSafety and the Prevent Duty.
- All staff to receive regular updates on safeguarding at least annually.
- Be able to keep detailed, accurate and secure written records of concerns and referrals.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- The DSL will ensure the policy is known, understood and used appropriately.

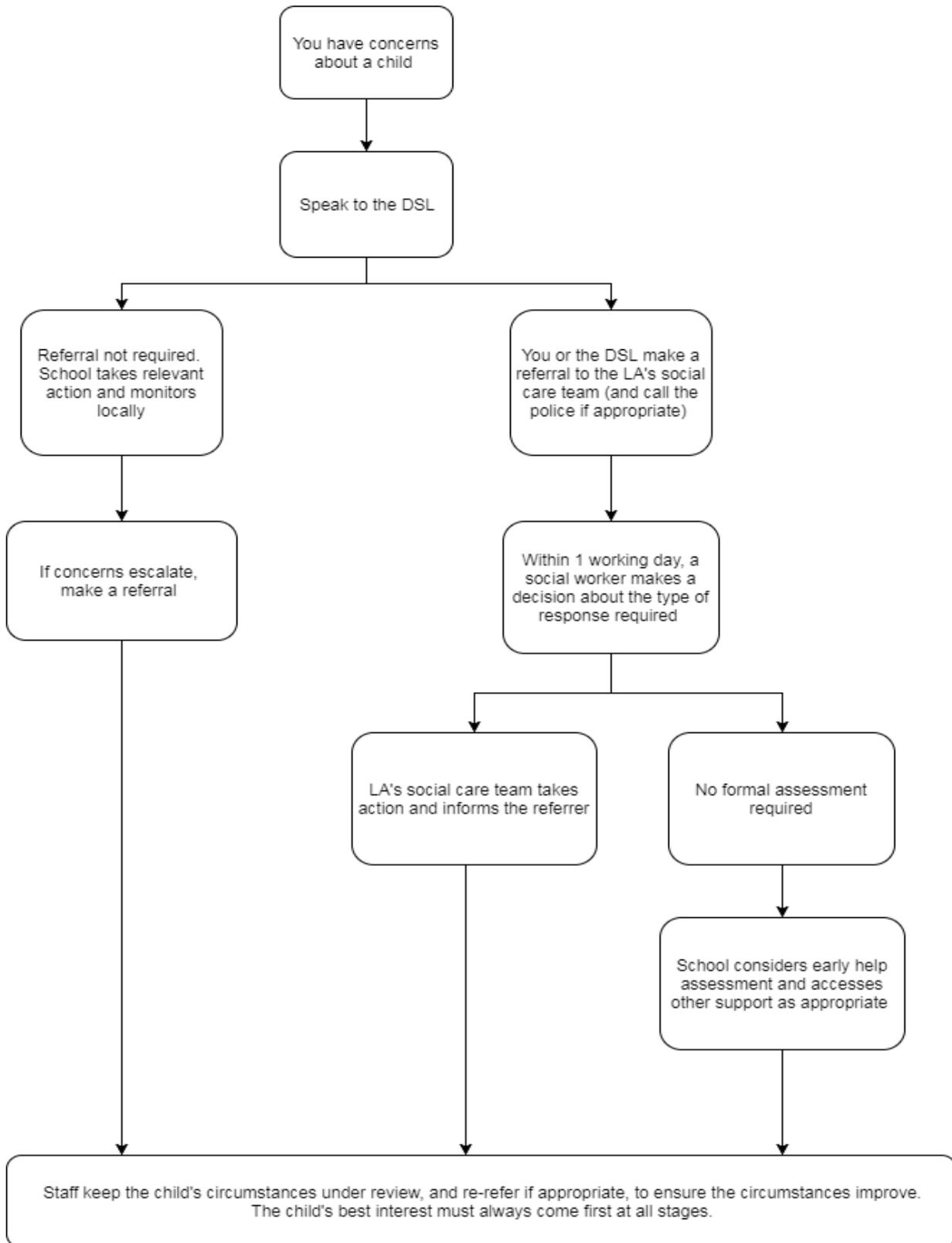
## **POLICY LINKS**

There are a number of HPRS policies that are relevant to safeguarding and promoting children's welfare. These include the following:

- Peer on Peer Abuse
- Attendance
- Behaviour management
- Equal Opportunities Policy
- Health and Safety
- E-Safety
- Whistle blowing
- Safer Recruitment

# SUMMARY OF PROCEDURE FOR CONCERNS REGARDING A PUPIL AT HPRS

Remember if a pupil is in immediate danger call 999 or the MASH Team on 01432 260800



## APPENDIX 1: TYPES OF ABUSE AND NEGLECT

### Abuse:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### Child Sexual Exploitation:

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it also

important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

## **Children with special educational needs and disabilities**

There can be additional barriers to recognising abuse and neglect in children with educational needs and disabilities. Children in this category can be disproportionately impacted without showing any outward signs. They may also experience barriers and difficulties in communicating how they feel. Follow the standard procedures above but take extra care to provide time for a child to explain and provide paper for drawings and other ways of communicating.

## **Children missing education**

At HPRS it is important for us as to maintain a caring, welcoming ethos which establishes a safe, secure and stable environment to enable pupils to grow, develop and learn. Accordingly, we must take reasonable steps, through pupil management and staff training programme, to ensure we know the safeguarding risks posed by children missing in education and to minimise the likelihood of one or more pupils absconding.

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

HPRS should hold a minimum of two emergency contacts for every child. Children missing education should be reported to the Attendance Officer. Wellbeing checks should be carried out to ensure that the child is safe.

The safeguarding procedures for children missing education can be found in the Attendance policy (See HPRS Attendance Policy).

The safeguarding procedures for children absconding can be found in the Absconding policy (See HPRS Absconding Policy and Procedures)

## **Contextual Safeguarding**

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials.

Assessments of children in such cases should consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare.

Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care.

Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child.

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

## Criminal exploitation

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

## Early Help

It is our duty to identify children/families that would benefit from further support at the earliest stage possible. All staff must share information with the DDSL or DSL however small. It can identify an emerging trend that may lead to a safeguarding issue.

- Listen and share information at Safeguarding meetings.
- Signpost to relevant information or courses.
- Refer to appropriate agencies (Early Help, MASH)
- Use the Multi Agency Child Exploitation Risk Assessment form to identify any emerging, moderate or significant risks of criminal or sexual exploitation.

## Female Genital Mutilation

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

If staff have any concerns about FGM they should contact the DSL immediately or contact the police immediately

## Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

## Honour-based violence (HBV)

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

## Online Safety and Sexting

At HPRS we continue to ensure that any form of abuse or harmful behaviour via technology is dealt with immediately and consistently to reduce the extent of harm to the young person.

HPRS do not allow mobile phones in school. Mobile devices will be stored safely on arrival at school and returned to pupils when they leave at the end of the session.

Due to the importance of Online Safety and Sexting we have a separate policy to address the issues concerned. (See HPRS E-Safety policy)

## Peer on peer abuse

Peer on peer abuse involves one child or young person causing harm to another. When considering whether behaviour is abusive, it is important to consider;

1. Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned.
2. Whether the perpetrator has repeatedly tried to harm one or more other children.
3. Whether there are concerns about the intention of the alleged perpetrator.

Peer on peer abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children. This behaviour may be physical, sexual or emotional and can include gender based violence, sexual assaults, sexting, teenage relationship abuse, peer on peer exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

## Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. If there is a suspicion of private fostering contact the DSL immediately.

## Prevent Duty

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk; they must take action when they observe behaviour of concern.

## Regulated activity

Means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

## Safeguarding across the curriculum

At HPRS we believe that Safeguarding of children involves every activity in every lesson and in every activity in school. Pupil safeguarding and the promotion of fundamental British values are a core business of our work at HPRS. Great importance is placed on identifying opportunities in the taught curriculum for children to learn about safeguarding so that they recognise when they are at risk and how to get help when they need it.

Our curriculum gives pupils opportunities to experience life in all its diversity, to acquire knowledge, understanding and skills that significantly impact on personal development, behaviour and welfare and equips every child with the knowledge and skills required for personal safeguarding.

We plan to constantly challenge children to think deeply about safeguarding matters and their own personal physical and mental wellbeing. Safeguarding knowledge is deepened through themes such as:

- managing emotional needs,
- what makes a family,
- stereotyping,
- bullying,
- dangers of extremism,
- substance misuse
- sex and relationships education
- e-safety;

We value pupils' questions and give them space for their own thoughts, ideas and concerns. We give them opportunities across the curriculum to explore values, personal rights, responsibilities and equal opportunities that develop moral concepts that impact positively on safeguarding, promote British values and prevent radicalisation and extremism

## Serious Crime

At HPRS we need to be vigilant to spot the signs of any of our children being at risk from, or involved in, serious crime. Staff should be aware of the indicators that children may be at risk from, or are involved in, serious violent crime. These may include:

- Increased absence from school
- Changing friendships, or forming friendships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or assault, or unexplained injuries
- Significant change in wellbeing
- Unexplained gifts or possessions

## Soft Intelligence

Soft Intelligence is described as observations, information of witnessed or heard events or even hearsay.

Information on child exploitation includes details on;

- Suspects – names, nicknames, addresses, dates of birth and descriptions of suspects of child exploitation
- Vehicles – registration numbers, partial registration numbers, make and model, colour and distinguishing features or marks of vehicles used by suspects
- Telephones – details of phone numbers and mobile phones used by suspects and details of any text messages of phone calls made by them or to them
- Addresses or locations – details of locations where offences have taken place or suspects/victims frequent
- Offences – details of criminal offences that have not been recorded by the police either because the victim has not been identified or the victim denies them or refuses to cooperate with the police

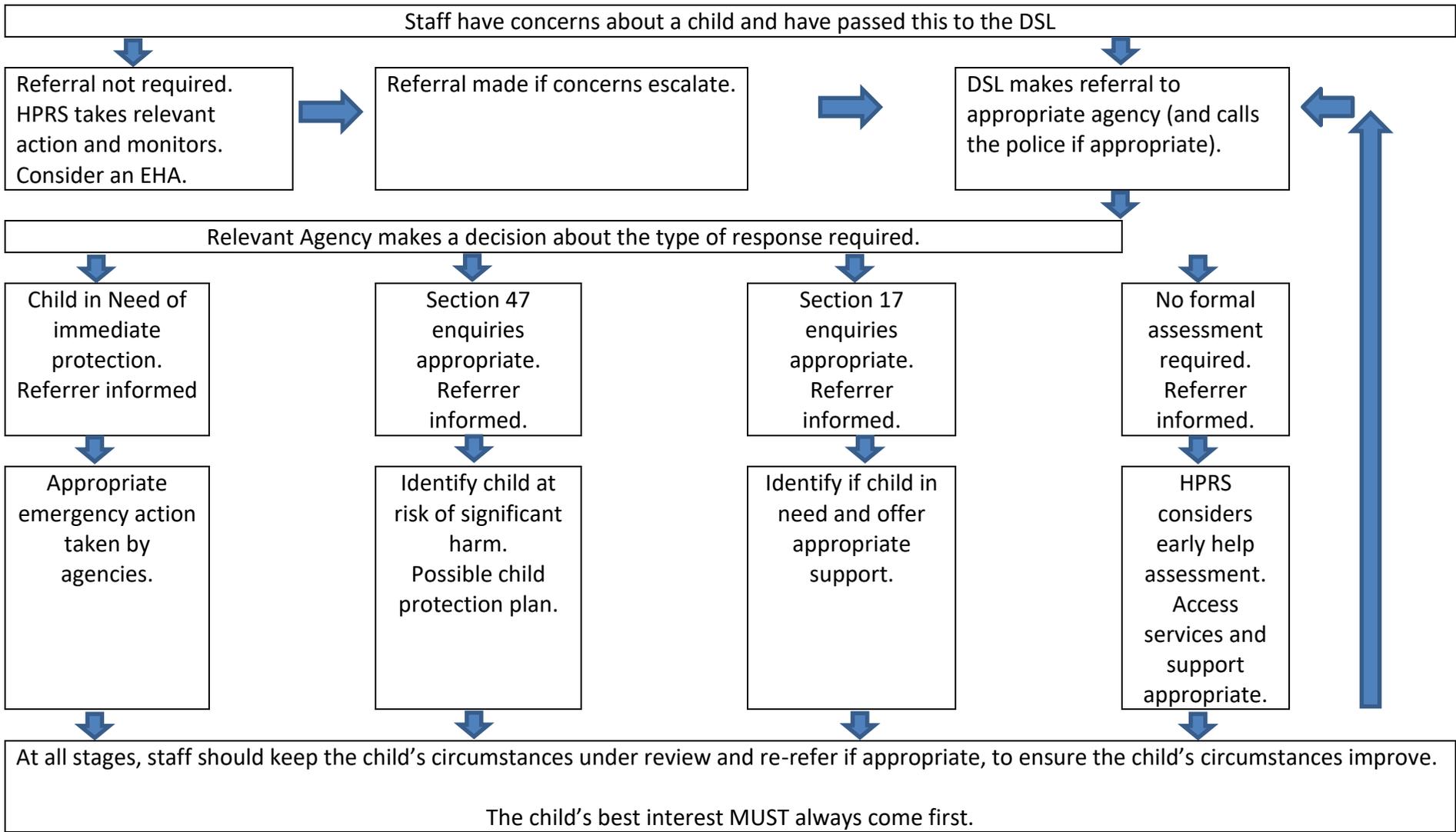
- Date and times – that incidents occurred or suspects or vehicles seen
- Links – between suspects, vehicles, locations and young people identified at risk of exploitation
- Links to other forms of exploitation such as modern slavery, county lines, trafficking

If you have any information, you MUST inform the DSL or DDSL. They can then make the decision as to whether the information needs to be passed to the police using their Soft Intelligence Form.

## **Upskirting**

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

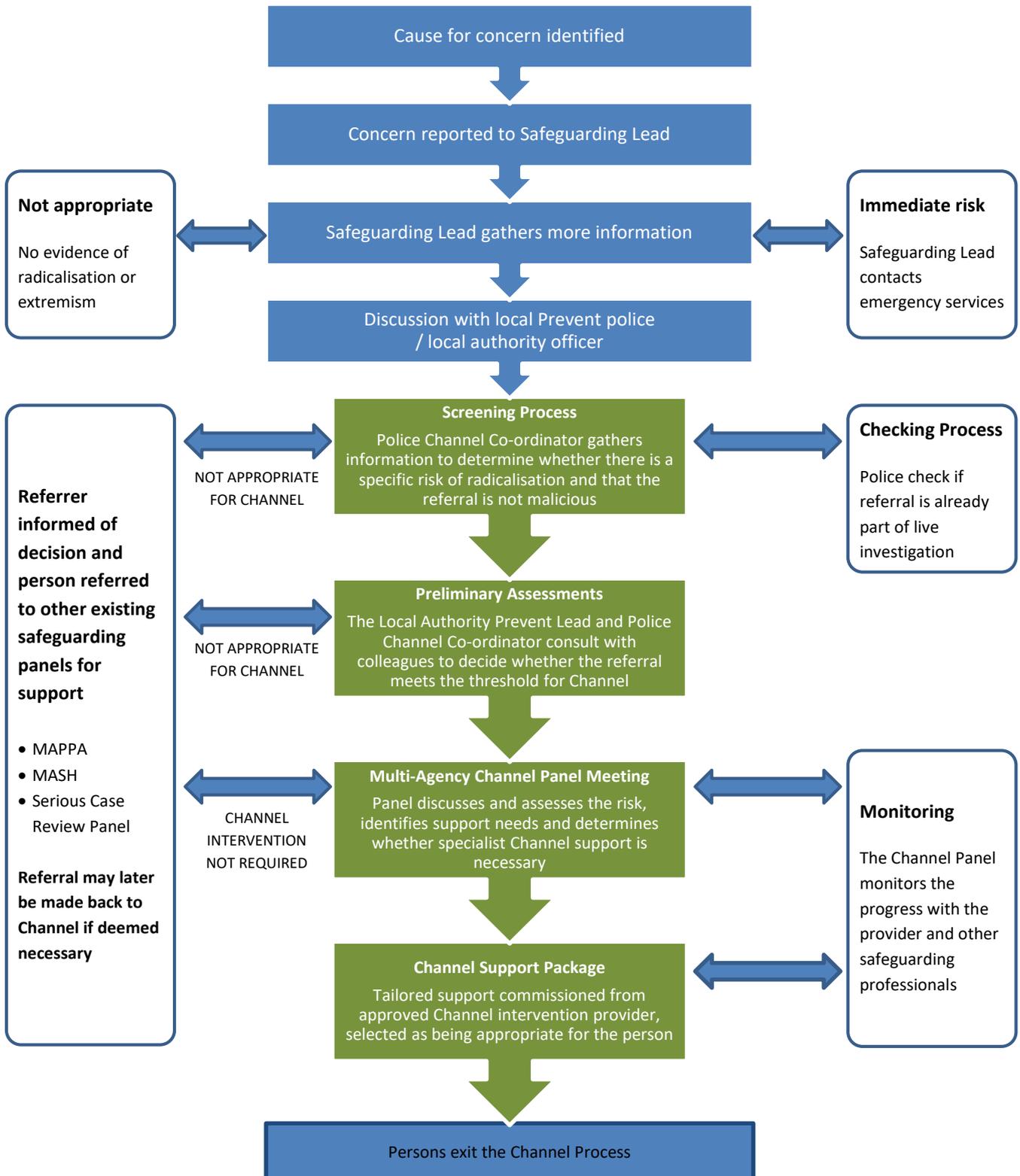
# APPENDIX 2: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD



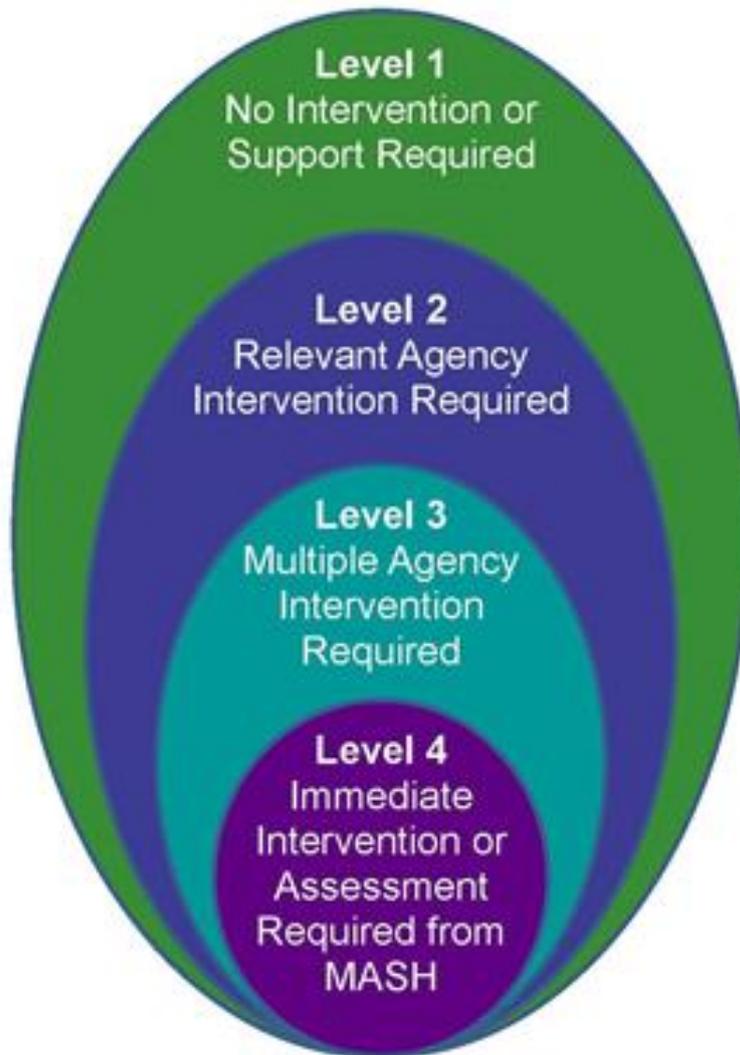
# APPENDIX 3: THE CHANNEL PROCESS

## The Channel Process within school

SPOC – Prevent Lead in School: Kimberly Harley



## APPENDIX 4: HEREFORDSHIRE LEVELS OF NEED PATHWAY



# APPENDIX 5: EXPLOITATION FLOWCART

## Exploitation Practice Flowchart: for young people and care leavers

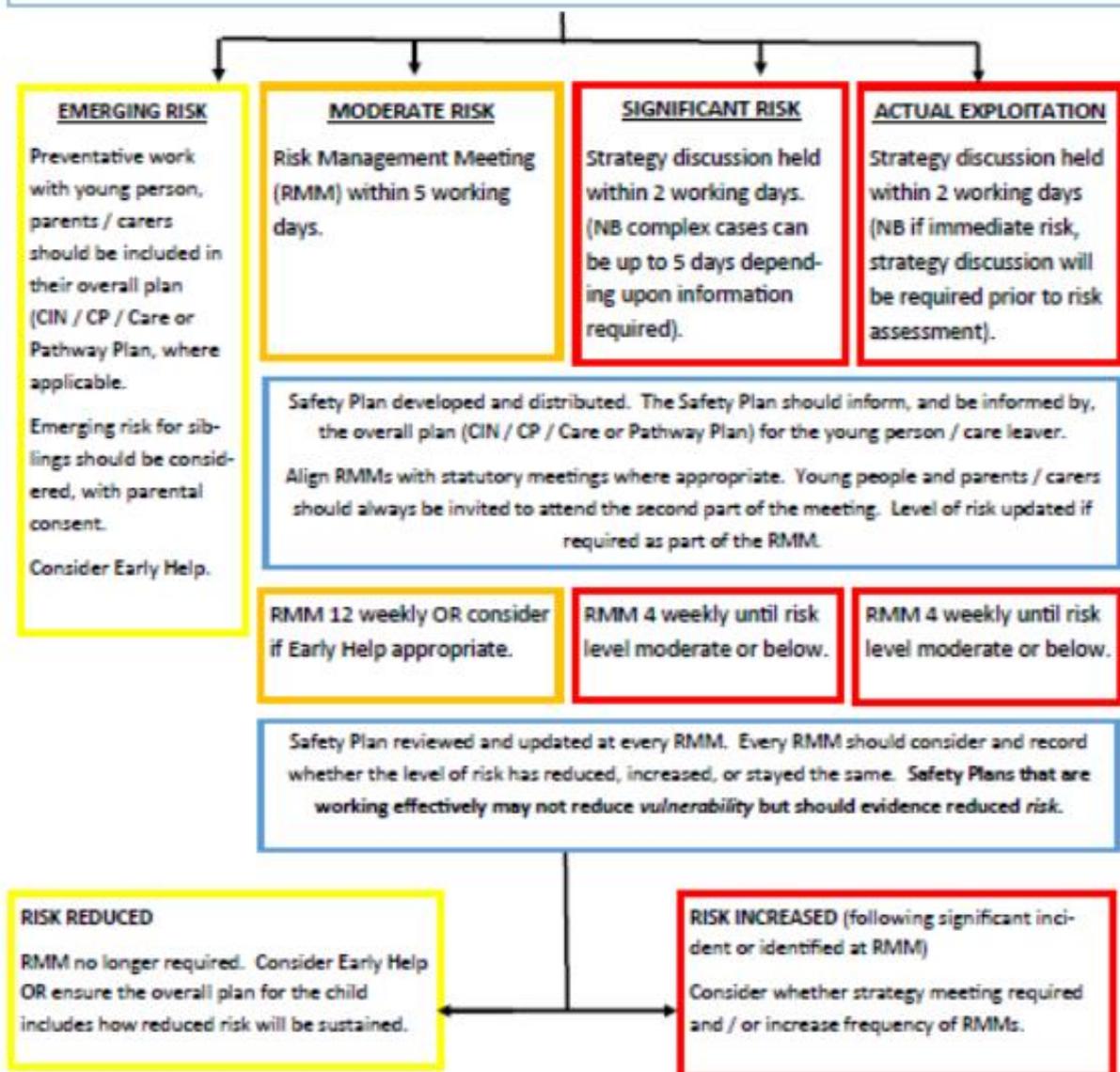
The exploitation risk assessment and risk management process applies to all young people identified as being at risk of exploitation, including care leavers.

The allocated Social Worker / Personal Advisor should complete the Exploitation Risk Assessment with the young person within 5 working days of the concerns being identified. The assessment should be sent to the Exploitation Co-Ordinators for oversight and then approved by the relevant Team Manager. Information should be shared with the Independent Chair / CP Chair / IRO where this is applicable.

Please refer to Mosaic training notes for further details about completing the assessment and convening a Risk Management Meeting.

Seek support and advice from an Exploitation Co-Ordinator if required: [exploitationteam@herefordshire.gov.uk](mailto:exploitationteam@herefordshire.gov.uk).

**Outcome of Exploitation Risk Assessment: practitioners should consider the significance of risk indicators individually and as a whole, including their relative weighting, applying their professional judgment.**



## APPENDIX 6: USEFUL CONTACTS

<a href="https://herefordshiresafeguardingboards.org.uk/">https://herefordshiresafeguardingboards.org.uk/</a>	01432 260100
Multi agency Safeguarding Hub (MASH)	
In office hours	01432 260800
Out of office hours: Emergency Duty Team	01905 768020
Prevent Co-ordinator	01432 383628
Early Help	01432 260261
West Mercia Police	08457 444888
Herefordshire Women's Aid	01432 356146
Local Authority Designated Officer LADO	01432 260940
NSPCC Whistleblowing helpline	0808 800 5000
DfES Helpline	02073 407264
Forced Marriages Unit	020 7008 0151