



Child Protection Policy

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Governors Committee accountable for review	Main Board
Senior Leadership Team member accountable for review	DPD

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1. Contacts

School contacts

Headteacher	Mr P B Wayne – 01494 524 955
Designated Safeguarding Lead (DSL)	Mr D P Durning – 01494 551 479
Deputy Designated Safeguarding Lead(s)	Mr J I Scourfield – 01494 551 405 Mrs S Herath – 01494 551427 Mrs G Barry – 01494 524 955
Nominated Safeguarding Governor	Belinda Avery
Chair of Governors	Mr B Casemore

Contacts in The Local Authority

<p>Education Safeguarding Advisory Service</p> <p>ESAS offers support to education providers to assist them to deliver effectively on all aspects of their safeguarding responsibilities.</p>	<p>01296 387981</p> <p>Secure-esasduty@buckinghamshire.gov.uk</p>
<p>First Response Team (aka MASH) (including Early Help, Channel)</p> <p>The First Response Team process all new referrals to social care, including children with disabilities. Referrals are assessed by the team to check the seriousness and urgency of the concerns and whether Section 17 and/or Section 47 of the Children Act 1989 apply. The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.</p>	<p>01296 383962</p> <p>Out of hours 0800 999 7677</p> <p>Secure-cypfirstresponse@buckinghamshire.gov.uk</p>
<p>Local Authority Designated Officer (LADO)</p> <p>The Buckinghamshire Local Authority Designated Officer (LADO) is responsible for overseeing the management of all allegations against people in a position of trust who work with children in Buckinghamshire on either a paid or voluntary basis</p>	<p>01296 382070</p> <p>Secure-lado@buckinghamshire.gov.uk</p>
<p>Bucks Family Information Service</p> <p>Information for families on a range of issues including childcare, finances, parenting and education</p>	<p>01296 383065</p>

[Buckinghamshire Safeguarding Children Partnership \(BSCP\)](#)

Procedures, policies and practice guidelines

[Schools Web](#)

School bulletin, Safeguarding links, A-Z guide to information and services

Buckinghamshire Council School Improvement and Traded Delivery Manager	01296 382461 Yvette.thomas@buckinghamshire.gov.uk
Buckinghamshire Council Prevent Co-ordinator	01296 674784 Alisonwatts1@buckinghamshire.gov.uk
Thames Valley Police	101 (999 in case of emergency)

Other contacts

NSPCC NSPCC	0800 800 5000
Childline Childline	0800 11 11
Kidscape – Parent Advice Line (bullying) (Mon-Weds from 9:30am to 2:30pm) Kidscape	020 7823 5430
Female Genital Mutilation Helpline (NSPCC) NSPCC FGM Helpline	0800 028 3550 fgmhelp@nspcc.org.uk
Samaritans - Helpline Samaritans	116 123
Forced Marriages Unit - Foreign and Commonwealth Office Forced marriage - GOV.UK	020 7008 0151 fm@fco.gov.uk
Crimestoppers Crimestoppers	0800 555 111
R-U Safe? Barnardos - Children/Young People Sexual Exploitation Service Barnardos RUSafe Bucks	01494 785 552
CEOP (Child Exploitation and Online Protection)	

This policy should be read in conjunction with the following policies and other policies you feel it would be useful to refer to:

- Anti-bullying
- Attendance
- Behaviour
- Curriculum
- Equalities
- E-Safety
- SEN/Inclusion
- Health & Safety
- Mobile Phone
- Photography
- PSHE to include RE and RSE
- Staff Code of Conduct
- Child on Child Abuse
- Sex and Relationships Education
- Preventing Radicalisation
- Whistleblowing
- Safer Recruitment

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of the safeguarding process and it refers to the procedures undertaken to protect individual children who have been identified as suffering or likely to suffer significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Further information regarding the categories of abuse can be found in the appendix to this document.

Children include everyone under the age of 18.

2. Introduction

At the Royal Grammar School we believe that a policy on child protection is founded on the right of all children to be safe. We expect all members of the school community including staff, governors, supply staff and volunteers to share this

commitment. Every member of the school community is responsible for contributing to a positive culture of safeguarding.

This policy has been developed in accordance with following legislation and guidance:

- Children Act 1989 (amended 2004)
- “Working Together to Safeguard Children 2018” - July 2018 [Working Together To Safeguard Children July 2018](#)
- “Keeping Children Safe in Education 2023 ”- statutory guidance for schools and further education colleges - [Keeping children safe in education \(publishing.service.gov.uk\)](#)(“KCSIE”)
- Information Sharing Guidance for Safeguarding Practitioners [Information Sharing Guidance](#) – DfE July 2018
- Children Missing Education; Statutory Guidance for Local Authorities - Sept 2016 [Children missing education - GOV.UK](#)
- Statutory Guidance issued under section 29 of the Counter-Terrorism and Security Act - 2015 [Prevent Duty Guidance](#)
- The Equality Act - 2010 [Equality Act 2010: guidance - GOV.UK](#)
- What to do if you’re worried a child is being abused - March 2015 [What to do if you are worried a child is being abused](#)
- Statutory guidance on FGM [Multi-agency Statutory Guidance on Female Genital Mutilation](#)

Clear governance and leadership is central to embedding a safeguarding culture. The Governing Body takes its responsibility seriously under **section 175 of the Education Act 2002** to safeguard and promote the welfare of children; working together with other agencies to ensure effective and robust arrangements are in place within our school to identify and support those children who are suffering harm or whom may be at risk of harm. Governors will ensure all staff at the school have read and understood their responsibilities pertaining to **Part 1, Part 5 and Annex B of Keeping Children Safe in Education**.

All staff are required to read and adhere to the **Staff Code of Conduct**.

Every member of the school community is responsible for contributing to a positive culture of safeguarding.

The school recognises that as well as risks to the welfare of children from within their families, children may be vulnerable to abuse or exploitation outside their homes and from other children. Staff must remain vigilant and alert to these potential risks.

The aims of this policy are:

To provide an environment in which children feel safe, secure, valued and respected.

To ensure that senior leaders, teaching staff and non-teaching staff, supply staff, governors and volunteers:

- Are aware of the need to safeguard and promote the wellbeing of children
- Identify the need for early support
- Promptly report concerns, in line with guidance from the Buckinghamshire Continuum of Need
- Are trained to recognise signs and indicators of abuse

To provide systematic means of monitoring children known to be or thought to be at risk of harm and ensure contribution to assessments of need and support plans for those children.

To ensure The Royal Grammar School has a clear system for communicating concerns both internally and with external agencies in line with the Working Together guidance.

To ensure the school has robust systems in place to accurately record safeguarding and child protection concerns.

To develop effective working relationships with all other agencies involved in safeguarding, supporting the needs of children at our school.

To ensure that all staff appointed have been through the safer recruitment process and understand the principles of safer working practices as set out in our **Staff Code of Conduct**.

To ensure that any community users of our facilities have due regard to expectations of how they should maintain a safe environment, which supports children's wellbeing.

This policy is published on our website, under, "about", "our policies" and hard copies are available from the school office.

3. Responsibilities

All staff, supply staff, volunteers, visitors, governors and contractors understand safeguarding children is everyone's responsibility. Any person who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred must report it immediately to David Durning (Designated Safeguarding Lead; DSL) or, in their absence, to Stefanie Herath, Jon Scourfield, & Gina Barry (Deputy DSLs). In the absence of either of the above, concerns will be brought to the attention of the most senior member of staff on site.

Staff must maintain a good working knowledge of the Buckinghamshire Continuum of Need [The Continuum of Need - Buckinghamshire Safeguarding](#)

[Children Partnership \(buckssafeguarding.org.uk\)](http://buckssafeguarding.org.uk) and any updates and how it should be used to inform decision making regarding a referral to First Response.

Staff must have the skills, knowledge and understanding to keep both looked after children and previously looked after children safe.

Staff must understand vulnerability and that barriers exist when recognising abuse. Consider the following groups who may have increased vulnerability:

- Young carers
- Children with SEND
- Children living with domestic abuse
- Children whose parents suffer with poor mental health, including substance misuse
- Criminal exploitation, including sexual exploitation, County Lines radicalisation and gang involvement
- Looked after children and previously look after children
- Children who have a social worker
- Privately fostered children
- Asylum seekers
- So-called Honour Based Violence, including FGM and forced marriage
- Children who frequently go missing or whose attendance is a concern
- Children who are part of the LGBTQ+ group
- Children who are at risk of discrimination due to faith and belief, race or ethnicity.

The Governing Body understands and fulfils its safeguarding responsibilities.

It must:

Ensure that the Headteacher and (when not the Headteacher) the DSL creates and maintains a strong, positive culture of safeguarding within the school.

Ensure that this policy reflects the unique features of the community we serve and the needs of the pupils attending our provision. This policy will be reviewed at least annually and whenever new guidance is issued.

Regularly monitor and evaluate the effectiveness of this Child Protection Policy.

Appoint a Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team (SLT) and has the required level of authority and also appoint at least one Deputy DSL. The roles and responsibilities of the DSL and Deputy DSL are made explicit in those post-holders' job descriptions. If not the DSL, the Headteacher still maintains overall responsibility for safeguarding and child protection within the school.

Recognise the importance of the role of the DSL, ensuring they have sufficient time, training, skills and resources to be effective. Refresher training must be attended every 2 years, in addition knowledge and skills must be refreshed at regular intervals, at least annually.

Ensure that all staff complete safeguarding training to include their roles and responsibilities with regards to the school IT system's online filtering and monitoring.

Ensure measures are in place for the governing body to have oversight of how the school's delivery against its safeguarding responsibilities are exercised and evidenced, to include reviewing online filtering and monitoring on a regular basis and at least annually. Ensure robust structures are in place to challenge the Headteacher where there are any identified gaps in practice or procedures are not followed.

Recognise the vital contribution that the school can make in helping children to keep safe, through incorporation of safeguarding within the curriculum. This will also be taught through the PSHE curriculum and relevant issues through the Relationship Education (primary schools) or Relationship Sex Education (secondary schools, mandatory from Sept. 2020). Ensure that through curriculum content and delivery children understand to keep themselves safe.

Ensure that school is following the statutory RSE guidance –[Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/relationships-and-sex-education-rse-and-health-education)

Ensure safe and effective recruitment policies and disciplinary procedures are in place.

Ensure resources are allocated to meet the needs of pupils requiring child Protection or early intervention.

Ensure the DSL completes an Annual Safeguarding Report for Governors and a copy is shared with the Education Safeguarding Advisory Service at Buckinghamshire Council.

It is the duty of the Chair of Governors, Ben Casemore, to liaise with relevant agencies if any allegations are made against the Headteacher. If there are concerns

that issues are not being progressed in an expedient manner, staff/pupils/parents/carers should escalate concerns to the Local Authority Designated Officer (LADO) via First Response.

The Governing body must ensure that procedures are in place to manage safeguarding concerns of allegations against staff, supply staff, governors, volunteers, visitors or contractors where they could pose a risk of harm to children. The guidance in Part four of [Keeping children safe in education 2023](#) (publishing.service.gov.uk) must be followed if there were any such concerns.

The Governing Body must ensure that a named teacher is designated for Looked After Children and that an up to date list of children who are subject to a Care Order or are accommodated by the Local Authority is regularly reviewed and updated. The school must work with the Virtual Schools Team to support the educational attainment for those children who are Looked After.

The governing body has a statutory duty to appoint a Nominated Governor for safeguarding. The Nominated Governor must be familiar with [Buckinghamshire Safeguarding Children Partnership](#) procedures, Local Authority procedures and guidance issued by the Department for Education. The Nominated Governor must:

- Work with the DSL to produce the Child Protection Policy annually.
- Undertake appropriate safeguarding training, to include Prevent and Safer Recruitment training.
- Ensure child protection is regularly discussed at Governing Body meetings
- Meet at least termly with the DSL to review and monitor the school's delivery on its safeguarding responsibilities, to review the Single Central Record and complete an audit of the staff files.
- Take responsibility to ensure that the school is meeting the OFSTED requirements as set out in the inspection guidance:

[Inspecting safeguarding in early years, education and skills settings](#)

[Education inspection framework \(EIF\) - GOV.UK \(www.gov.uk\)](#)

All governors must complete safeguarding training on appointment, to also include Prevent training. This training must be regularly updated in line with national or local guidance. The governing body must ensure that relevant staff have due regard to the relevant data protection principles set out in the Data Protection Act 2018 and the GDPR, which allow them to share or withhold personal information when it is necessary to safeguard any child.

We have a Designated Safeguarding Lead (DSL) who is responsible for:

Creating a culture of safeguarding within the school where children are protected from harm. Ensuring all staff receive an effective induction and ongoing training to support them to recognise and report any concerns.

Ensuring children receive the right help at the right time using the Buckinghamshire Continuum of Need document.

Ensuring referrals to partner agencies, are followed up in writing, including referrals to First Response and Early Help (FSS).

Establishing and maintaining a safe and secure system for recording safeguarding and child protection records. These records must be audited regularly to ensure all actions are completed.

Ensuring all child protection files are held separately from pupils' educational records.

Maintaining the record for staff safeguarding training.

Ensuring that the safeguarding team contact details and photos are displayed in prominent areas around the school and also on the website.

Being the designated point of contact for staff to be able to discuss and share their concerns.

Ensuring the online filtering and monitoring system is reviewed regularly, at least annually.

Being available to staff and outside agencies during school hours and term time for consultation on safeguarding concerns raised.

Having responsibility to ensure that cover is arranged outside of term-time during working hours, with the expectation that all meetings in school holidays are attended including those convened at short notice.

During residential and extended school hours, ensuring arrangements are in place for staff to have a point of contact.

Contributing effectively to multi agency working, for the safeguarding and promotion of the welfare of children, as set out in Working Together.

Providing the Headteacher (if the Headteacher is not the DSL), with at least an annual report for the Governing Body, detailing how the school delivers on its safeguarding responsibilities and any child protection issues within the school. The Governing Body will use this report to fulfil its responsibility to provide the Local Authority with information about their safeguarding policies and procedures

Meeting at least once a term with the Nominated Governor to share oversight of the safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in policy or procedure. A record should be kept of these meetings. Providing the Headteacher (if DSL is not Headteacher) with up to date information of any issues.

Meeting the statutory requirement to keep up to date with knowledge, enabling them to fulfil their role, including attending mandatory and any other additional relevant training.

Referring immediately to the Police, using the guidance, When to call the police [2491596 C&YP schools guides.indd \(npcc.police.uk\)](#) for any cases where a criminal offence may have been committed or risk of harm is imminent.

4. Procedures

Our school procedures for all staff, supply staff, governors, volunteers, visitors and contractors in safeguarding and protecting children from harm are in line with Buckinghamshire Council and [Buckinghamshire Safeguarding Children Partnership](#) safeguarding procedures, **“Working Together to Safeguard Children 2018”** [Working Together to Safeguard Children 2018](#), **“Keeping Children Safe in Education”** [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#) and statutory guidance issued under section 29 of the **Counter-Terrorism and Security Act 2015** [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](#).

This policy also encompasses all children, adults and working practices in Fraser Youens Boarding House. There are additional specific boarding house guidelines relating to child protection and safe working practices in the Boarding House Handbook for Staff.

We will ensure:

Visitors must be:

- Clearly identified with visitor/contractor passes.
- Met and directed by school staff/representatives.
- Signed in and out of the premises by school staff.
- Given a safeguarding leaflet to read or directed to a poster informing them of how to report a concern
- Given restricted access to only specific areas of the school, as appropriate.
- Escorted by a member of staff/representative as required.
- Given access to pupils restricted to the purpose of their visit.

All members of staff must complete regular safeguarding training, attend regular refresher training and partake in any training opportunities arranged or delivered by the DSL. Updates must be cascaded to all staff throughout, at a minimum of once a year. All new staff will receive safeguarding and child protection training on induction including online safety.

All parents/carers must be made aware of the school’s responsibilities in regard to child protection procedures through this policy.

All staff, including supply staff, must follow the reporting procedures as follows when reporting any child protection concerns:

- All staff must follow the reporting procedures as follows when reporting any child protection concerns:

- Staff must ensure the child is in a safe place and in receipt of support;
- Staff must initially make a verbal report to the DSL to alert them to the safeguarding/child protection concern;
- Staff must make a written report using the school record keeping process;
- Staff can report concerns on CPOMS at <https://rgshw.cpoms.net>. For staff using CPOMS for the first time, guidance can be found in the Safeguarding area on SharePoint. Volunteers and visitors can report concerns on pink RGS Child Protection/Welfare Concern Forms which are available in staff rooms and from the Student Hub.
- Staff must ensure the time and date of the incident is recorded;
- A factual account of the incident must be recorded, including who was involved, what was said/seen/heard, where the incident took place and any actual words or phrases used by the child;
- Use a body map where appropriate to record any injuries seen or reported by the child:
- Staff must sign and date the pink RGS Child Protection/Welfare Concern Form and complete the appropriate boxes on CPOMS.
- The DSL must record when the report was passed to them and what action was taken alongside any outcomes achieved.
- The DSL must ensure that the child's wishes and feelings are taken into consideration when deciding on next steps.

Through our **Attendance Policy**, we have a robust system for monitoring attendance and will act to address absenteeism with parents/carers and pupils promptly and identify any safeguarding issues arising. Parents/carers of students are asked to contact the Attendance Officer on the first and every day of an absence from school. If a student is absent from school without notification from the parent/carer, the Attendance Officer emails the parent/carer on the first day. If there is no response on the second day of absence the Attendance Officer phones the parent/carer and if there is still no response the Attendance Officer contacts a Head of Year to follow-up the matter.

All children attending our school are required to have a minimum of two identified emergency contacts. Any pupil whose absence is causing concern and where it has not been possible to make contact with a parent/carer, will be reported as a Child Absent from Education using the **Buckinghamshire Protocol**. Any absence of a pupil who is currently subject to a child protection or child in need plan is immediately referred to their social worker.

The Royal Grammar School has a mandatory duty to inform the local authority, via the First Response Team, if they become aware that a child under the age of 16 years is living with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

All staff, parents/carers and children are made aware of the school's escalation process which can be activated in the event of concerns not being resolved after the first point of contact. They can do this by contacting the Headteacher or the Safeguarding Governor via the School Office. We acknowledge an individual's safeguarding responsibility does not end once they have informed the DSL of any concerns, although specific details of further actions may be appropriately withheld by the DSL as information will only be shared on a need to know basis.

Our lettings policy reflects the ongoing responsibility the school has for safeguarding those using the site outside of normal school hours, ensuring the suitability of adults working with children on school sites at any time. School must have sight of the up to date **Child Protection Policy** of any organisation hiring the school's facilities.

The school operates **Safer Recruitment** practices. Governors ensure that staff who are involved in the recruitment process have received safer recruitment training. Robust procedures are in place in order to prevent and deter people who are unsuitable to work with children, from applying or being employed by the school.

Allegations against members of staff, supply staff, governors, including volunteers and contractors are referred to the Local Authority Designated Officer (LADO).

Our procedures are reviewed and updated annually as a minimum, or as there are changes to legislation.

Children are encouraged to share any concerns or worries with staff and are regularly reminded about this as part of the curriculum, assemblies and tutor time.

5. Record-Keeping and Retention of Records

When a disclosure of abuse or an allegation against a member of staff or volunteer has been made, no matter how low level, our school must have a record of this. These records are maintained in a way that is confidential and secure, in accordance with our **Record Keeping Policy** and **Data Protection Legislation**.

Records should include:

- a clear and comprehensive summary of the concern
- a clear, detailed and robust chronology must be maintained
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

There is a statutory requirement for our school to pass any child protection records to the pupil's next school. This must take place within 5 days of the 1st day of term or within 5 days of an in-year transfer. There must be an auditable system in place to evidence this has taken place. Safeguarding records will be sent separately from the general files using a secure method. No records should be maintained within the school once the files have been transferred.

The last statutory school maintains child protection files until a pupil reaches the age of 25 years, therefore if the transfer school is unknown, or a pupil is going to be electively home educated, any child protection files will remain at our school in a secure location. Child protection files will only be destroyed when the pupil reaches their 25th birthday.

We have a robust system for reviewing our archived information held. Our files are stored and disposed of in line with GDPR protocols, local and national retention policies.

6. Alternative Provision

When a child is accessing an alternative provision, the school will ensure that the provision has secure and robust safeguarding arrangements in place. A member of staff, from school, will regularly visit the provision and meet with the child to hear their voice.

7. Confidentiality

We recognise that all matters relating to child protection are confidential. The Headteacher or Designated Safeguarding Lead must only disclose personal information about a pupil to other members of staff on a need to know basis. Staff must not keep duplicate or personal records of child protection concerns. All information must be reported to the Designated Safeguarding Lead and securely stored in the designated location within the school, separate from the pupil records. All staff are aware they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another as they have a duty to share. Staff must, however, reassure the child that information will only be shared with those people who will be able to help them and therefore need to know. We will always undertake to share our intention to refer a child to Social Care (First Response) with their parent/carer's consent, unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with First Response on this point. We recognise that UK GDPR and Data Protection Act 2018 must not be a barrier for sharing information regarding safeguarding concerns in line with '**Working Together**'. Gov guidance link:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

8. Recognising abuse

In the event of a child disclosing abuse staff must:

Refer to the following guidance:

“What to do if You’re Worried a Child is Being Abused”
[Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Listen to the child, allowing the child to tell what has happened in their own way and at their own pace. Staff must not interrupt a child who is freely recalling significant events. Remain calm. Be reassuring and supportive, endeavouring not to respond emotionally.

Not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the child may have said or to gain sufficient information to know that this is a safeguarding concern. Staff are trained to use TED; Tell, Explain, Describe.

Make an accurate record of what they have seen/heard using the school’s record keeping processes (CPOMS), recording; times, dates or locations mentioned, using as many words and expressions used by the child, as possible. Staff must not substitute anatomically correct names for body part names used by the child. Reassure the child that they did the right thing in telling someone.

Staff must explain to the child what will happen next and the need for the information to be shared with the DSL.

In the unlikely event the DSL and the deputy DSL are not available, staff are aware they must share their concerns with the most senior member of staff.

If there is immediate risk of harm to a child, staff will NOT DELAY and will ring 999.

The child will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.

Following a report of concerns the DSL must:

Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to First Response and the police if it is appropriate, referring to the guidance, When To Call The Police:

[2491596 C&YP schools guides.indd \(npcc.police.uk\)](#)

The rationale for this decision should be recorded by the DSL.

School should try to discuss any concerns about a child’s welfare with parents/carers and, where possible, obtain consent before making a referral to First Response. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child’s family, the DSL should clarify with First Response or the police whether the parents/carers should be told about

the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.

If there are grounds to suspect a child is suffering or is likely to suffer significant harm, the DSL (or Deputy) must contact First Response by telephone immediately, in the first instance and then complete the Multi Agency Referral Form (MARF).

If the child is in immediate danger and urgent protective action is required, the police and/or ambulance must be called, via 999. The DSL must notify First Response of the occurrence, what action has been taken and to take advice about informing parents/carers.

9. Multi-agency working

The Royal Grammar School know what the role of schools is, as a relevant agency, within the three safeguarding partner arrangements and as required, will contribute to multi-agency working, in line with the statutory guidance 'Working Together to Safeguard Children'.

When named as a relevant agency and involved in safeguarding arrangements, The Royal Grammar School will co-operate alongside other agencies with the published arrangements.

The Royal Grammar School will contribute to inter-agency plans to offer children support or early help and those children supported through child protection plans.

The Royal Grammar School will allow access for and work with children's social care to conduct or consider whether to conduct a section 17 or a section 47 assessment.

If, following a referral, the situation is not improving for the child, the DSL will follow the escalation process.

10. Supporting Staff

We recognise that staff becoming involved with a child who has suffered harm, or appears to be likely to suffer harm, could find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support if necessary. This could be provided by the Headteacher or another trusted colleague, Occupational Health, and/or a representative of a professional body, Employee Assistance Programme (PAM) or trade union, as appropriate.

11. Safer Recruitment

The Royal Grammar School follows the guidance as set out in the KCSIE together with the information provided by the Bucks Safeguarding Children Partnership to

ensure that all the appropriate checks have been carried out on new staff, volunteers, governors, invigilators and supply staff

[Safer Employment & the LADO \(Allegations\) - Buckinghamshire Safeguarding Children Partnership \(buckssafeguarding.org.uk\)](http://buckssafeguarding.org.uk)

12. Allegations against staff, supply staff, volunteers and contractors (including Governors)

Here at The Royal Grammar School, we have our own procedures for managing concerns and/or allegations against those working in school to include staff, supply teachers, volunteers and contractors.

KCSIE 2023 - Part four contains comprehensive guidance covering the two levels of allegations/concern:

1. allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold - referred to for the purpose of this guidance as 'low level concerns'.

All school staff, supply staff, volunteers and contractors must take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents/carers to be conducted in view of other adults.

We understand that a pupil may make an allegation against a member of staff, member of supply staff, volunteer or contractor. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Headteacher or the most senior teacher if the Headteacher is not present. If the allegation is made against the Headteacher, the Chair of Governors must be informed.

At The Royal Grammar School, we recognise that an allegation may be made if a member of staff, a member of supply staff, a governor, a volunteer or a contractor has:

- 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. This includes behaviours both inside and outside of school.

The Headteacher/Senior Teacher/Chair of governors (where the allegation is in reference to the Head Teacher) on all such occasions must immediately discuss the content of the allegation with the Local Authority Designated Officer (LADO).

The Head Teacher/Senior Teacher must:

Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member, supply staff member, governor, volunteer or contractor against whom the allegation is made, as well as supporting other staff, supply staff members, governors, volunteers and contractors within the workplace.

Follow all advice given by the LADO relating to supporting the child making the allegation, as well as other children connected to the organisation.

Ensure feedback is provided to the LADO about the outcome of any internal investigations.

The school will follow the local safeguarding procedures for managing allegations against staff, supply staff, governors, volunteers and contractors, a copy of which can be found on SharePoint, in the All Staff drive

If the allegation is made against a member of staff supplied by an external agency, the agency will be kept fully informed and involved in any enquiries from the LADO.

Suspension of the member of staff against whom an allegation has been made needs careful consideration and, if necessary, we will consult with the LADO in making this decision. Guidance will also be sought from HR.

Our lettings agreement for other users requires that the organiser will follow the Buckinghamshire Council procedures for managing allegations against staff and where necessary, the suspension of adults from school premises.

Should an individual staff member, supply staff member, governor, volunteer or contractor be involved in child protection, other safeguarding procedures or Police investigations in relation to abuse or neglect, they must immediately inform the Head Teacher. In these circumstances, the school will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with children.

13. Whistleblowing

We have a **Whistleblowing Policy** which can be found on Sharepoint in the All Staff Drive Staff are required to familiarise themselves with this document during their induction period.

All staff must be aware of their duty to raise concerns about the attitude or actions of colleagues and report their concerns to the Headteacher or Chair of Governors.

Low-level concerns

At The Royal Grammar School, all staff know they have a responsibility to share any concerns, no matter how small, about any adults working in school to Head, DSL or Deputy Head. Staff are made aware of what a low-level concern might look like using the examples from the KCSIE page

All reports will be dealt with effectively and recorded, enabling the school to identify any concerning behaviour and support any adults becoming the subject of false low-level concerns.

A copy of the Low Level Concerns Policy can be found here in Appendix II

14. Physical intervention/Positive handling

Our policy on physical intervention/positive handling by staff is set out separately, as part of our Code of Conduct for Safer Working Practices and follows the government guidance.

[Use of reasonable force and restrictive practices in schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

15. Anti-Bullying

Anti-Bullying is referenced within the **Anti-Bullying and Behaviour Policies** and measures are in place to prevent and respond to all forms of bullying, which acknowledge that to allow or condone bullying may lead to consideration under child protection procedures. The Anti-Bullying Policy is available to all staff, parents/carers and pupils on the school website. We also have an Anti-Bullying Charter which is displayed in every classroom.

16. Discriminatory Incidents

In line with the **Equalities Act 2010**, our **Equalities and Cohesion Policy** addresses all forms of discriminatory incidents. It takes into account the guidance offered by the Buckinghamshire guidance document 'Equally Safe – Dealing with Prejudice Related Incidents Guidance for Schools'.

17. Health and Safety

We recognise the importance of safeguarding pupils throughout the school day. Our **Health and Safety policy** reflects the consideration we give to the protection of our children, both physically and emotionally, within the school environment.

Pupils who leave the site during the school day do so only with the written permission of a parent/carer and are collected by an authorised adult where appropriate. School should be notified by the parents/carers regarding whom they have authorised for this task. This should be done via an email to attendance@rgshw.com from a parents email address held on our MIS

In the event of a pupil going missing during the course of the school day we will carry out immediate checks to ensure the pupil is not on site, we will then make contact with the pupil's parents/carers and inform the police.

When the school is hired out to a 3rd party provider, we ensure that they have appropriate arrangements in place to keep children safe through the sight of their child protection and safer recruitment procedures.

At the Royal Grammar School we ensure that we are aware of the content of materials used by any visiting speakers prior to their visit.

18. Prevent Duty

We are aware of the Prevent Duty under **Section 26 of the Counter Terrorism and Security Act 2015** to protect young people from being drawn into terrorism.

All school staff and governors have completed Prevent training and we have training logs to evidence this.

We have in place and monitor appropriate web filtering systems.

The DSLs and senior leaders are familiar with their duties under The Prevent Duty Guidance: [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/Revised_Prevent_duty_guidance_for_England_and_Wales_-_GOV.UK.pdf)

19. Online Safety

All staff are aware of the school policy for **Online-Safety** which sets out our expectations relating to:

- Creating a safer online learning environment,
- Giving everyone the skills, knowledge and understanding to help children stay safe on-line, question the information they are accessing and support the development of critical thinking,
- Inspiring safe and responsible use of mobile technologies, to combat behaviours on-line which may make pupils vulnerable, including the sending of nude or semi-nude images.
- Use of camera equipment, including smart phones.
- What steps to take if there are concerns and where to go for help.
- Staff use of social media as set out in the **Staff Code of Conduct**.

Cyber-bullying by children, via texts, social media and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

School are aware of the risks posed by children in the online world; in particular non-age appropriate content linked to self-harm, suicide, grooming and radicalisation.

Pupils, staff and parents/carers are supported to understand the risks posed by:

- the CONTENT accessed by pupils
 - their CONDUCT on-line
 - who they have CONTACT within the digital world
 - COMMERCE - risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Further information can be found in our online safety policy

The Royal Grammar School has online filtering and monitoring systems in place to ensure children are safeguarded from potentially harmful online material. These systems are regularly monitored, at least annually, by the DSL, IT provider and nominated governor. A record will be kept of the reviews.

School will follow the advice as given by the government, to advise and support children with any online learning taking place at home to ensure this is done so safely.

We have a separate **Mobile Phone Policy** which sets out the acceptable use of mobile technologies by pupils whilst onsite. This includes sanctions which will be applied when these boundaries are not adhered to.

Visitors to our school are respectfully requested to turn all mobile devices off.

Staff use of mobile technology whilst on site is set out in the **Staff Code of Conduct**.

All staff receive online awareness training in order to understand the risks children are exposed to. On induction and at least once per academic year.

All staff have an understanding of expectations roles and responsibilities with regards to the online filtering and monitoring processes.

20. Sending nude or semi-nude images

Sending nude images or semi-nude images, is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media or the internet. It is accepted that children experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

Further advice and guidance can be found using the link below:

[Sharing nudes and semi-nudes](#)

Staff, pupils and parents/carers are supported, via training, to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes images of pupils themselves if they are under the age of 18.

Any disclosures/incidents that occur will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#) produced by the UK Council for Internet Safety. The DSL will inform parents/carers of any incidents.

21. Child on Child Abuse, including sexual violence and sexual harassment.

The Royal Grammar School believes that all children have a right to attend school and learn in a safe environment free from harm by both adults and other pupils. We recognise that some safeguarding concerns can occur via child on child abuse.

All staff operate a zero-tolerance policy to child on child abuse and will not pass off incidents as 'banter' or 'just growing up'.

All staff recognise that child on child issues may include, but may not be limited to:

- Bullying (including cyber bullying)
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm
- Sexual violence and sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party (Harmful sexual behaviour HSB)
- Abuse related to sexual orientation or identity
- Sending nude or semi-nude images (consensual & non-consensual)
- Upskirting and initiation/hazing type violence and rituals
- Emotional abuse
- Abuse within intimate partner relationships

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. Incidents of child on child abuse must be reported to the DSL, who will refer to the appropriate agencies as required.

The following will be considered when dealing with incidents:

- Whether there is a large difference in power between the victim and perpetrator i.e. size, age, ability, perceived social status or vulnerabilities, including SEND, CP/CIN or CLA
- Whether the perpetrator has previously tried to harm or intimidate pupils
- Any concerns about the intentions of the alleged perpetrator
- How to best support and protect the victim and alleged perpetrator as well as any other children who may have been involved or impacted.
- Risk assessments and safety planning will be created in conjunction with external professionals.

In order to minimise the risk of child on child abuse taking place, as a school we must:

- Deliver RE/RSE/PSHE to include teaching pupils about how to keep safe and understanding what acceptable behaviour looks like
- Ensure that pupils know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any pupil to be able to voice concerns
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying Policy**.

We recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. We understand that it causes the victim distress and humiliation and that any gender can be a victim. Staff recognise that 'Upskirting' is a criminal offence and must promptly report any such incidents to the Headteacher, DSL or most senior member of staff.

Reference will be made to the following government guidance and part 5 of **Keeping Children Safe in Education 2023** to ensure that all staff have an understanding of the serious nature of sexual violence and sexual harassment between children in schools. The school ensure that they keep up with current legislation and practice referring to trusted advisors such as BSCP, NSPCC and Ofsted guidance.

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. This can occur online, face to face (both physically and verbally) and can take place inside or outside of school. As set out in Part five of KCSIE 2023, all staff maintain an attitude of '**it could happen here**' and it is never acceptable.

All staff have a responsibility to address inappropriate behaviour in a timely manner,

however seemingly insignificant it may appear.

All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. No child will ever be made to feel ashamed for making a report or that they are creating a problem for our school.

Support will be given to both victims and perpetrators as required.

22. Cultural Issues

As a school we are aware of the cultural diversity of the community around us and work sensitively to address the unique culture of our pupils and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse arising from culture, ethnicity, faith and belief on the part of their parent, carer or wider community.

Staff must report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

23. So-Called 'Honour' Based Abuse

Staff at our school understand there is a legal duty to report known cases of Female Genital Mutilation (FGM) and So Called 'Honour' Based Abuse to the police and they will do this with the support of the DSL. [Mandatory reporting of female genital mutilation: procedural information - GOV.UK](#)

Our school is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of child abuse and a breach of children's rights. We recognise some pupils, due to capacity or additional learning needs, may not be able to give an informed consent and this will be dealt with under our child protection processes. The Royal Grammar School staff can contact the Forced Marriage Unit if they need advice or information. Contact 020 7008 0151 fm@fcdo.gov.uk

We are aware of the signs of FGM [Female genital mutilation \(FGM\) | NSPCC](#)

We recognise both male and female pupils may be subject to honour-based abuse.

We promote awareness through training and access to resources, ensuring that the signs and indicators are known and recognised by staff.

Any suspicions or concerns for forced marriage are reported to the DSL who will refer to First Response or the police if emergency action is required.

24. Contextual Safeguarding and extra-familial harms

Contextual Safeguarding is an approach to understanding and responding to children's experiences of significant harm beyond their families. Extra-familial harm is linked to contextual safeguarding; these concepts refer to harms that occur outside of the family system often during the adolescent years.

At The Royal Grammar School, all staff recognise that pupils may encounter safeguarding incidents that happen outside of school and can occur between children outside of this environment. We will respond to such concerns, reporting to the appropriate agencies in order to support and protect the pupil.

All staff and especially the DSLs, will consider the context of incidents that occur outside of school to establish if situations outside of their families may be putting the pupil's welfare and safety at risk of abuse or exploitation, including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Children who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare.

In such cases the individual needs and vulnerabilities of each child will be considered.

Further guidance can be found at: <https://contextualsafeguarding.org.uk/>

25. Serious Violence

All staff are aware of signs and indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being or signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

At The Royal Grammar School we are aware of the range of risk factors which increase the likelihood of involvement in serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery. School will take appropriate measures to manage any situations arising. [Preventing youth violence and gang involvement - Practical advice for schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614222/preventing-youth-violence-and-gang-involvement-practical-advice-for-schools-and-colleges.pdf)

26. Domestic Abuse

All staff recognise that children can witness and be affected by domestic abuse that occurs within their home between family members. They may also experience abuse within their own intimate relationships, referred to as 'teenage relationship abuse' and can suffer long lasting emotional and psychological effects. Staff will report any concerns using the school's safeguarding procedures.

27. Children who need a social worker (Child Protection and Child In Need Plans)

Staff recognise that children may have a social worker due to safeguarding or welfare needs and this can cause them to have barriers with attendance, behaviour, learning and mental health.

The Royal Grammar School will share information with a social worker for any child whom they are supporting to ensure decisions are made in the best interests of the child.

Informed decisions, will be made by staff with regards to safeguarding for those children who are being supported by a social worker.

The Virtual School leads the support for this cohort of children and the Royal Grammar School will work in partnership with them and the Local Authority to improve outcomes for these children.

28. Mental Health

At The Royal Grammar School, we are aware that mental health problems can be an indicator that a child has suffered or may be at risk of suffering abuse, neglect, or exploitation.

Staff recognise that traumatic adverse childhood experiences can have lasting impact throughout a child's life and this can impact on mental health, behaviour and education.

Staff will report any mental health concern that is linked to a safeguarding concern to the DSL.

Where there are concerns for a child's mental health The Royal Grammar School will seek advice from a trained professional, who would be able to make a diagnosis of a mental health problem.

[Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

The school Mental Health Lead is David Durning - Assistant Head (Student Development), supported by the Pastoral team.

29. Looked After Children (“ LAC”)

The Royal Grammar School has a named Designated Teacher (DT), who is responsible

for promoting the education achievement and well-being for LAC and previously LAC children.

The DT works closely with the DSL to ensure that any safeguarding concerns are responded to quickly and effectively and are shared with the appropriate agencies.

The Virtual School, who is responsible for overseeing the progress of this group of children, work in partnership with the DT and other agencies, supporting them to promote better outcomes for these children.

30.Children with family members in prison

Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. School will access support for any affected children through The National Information Centre on Children of Offenders (NICCO) who can provide information designed to support professionals working with offenders and their children.

[NICCO](#)

31. Homelessness

The Royal Grammar School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and that some 16 and 17 year olds could be living independently from their parents or guardians. If there are indicators that a family or individual is at risk, the school will seek timely support from the local authority.

32. Modern Slavery and the National referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If the school are concerned that a child is being affected by modern slavery they will refer to the home office guidance for further information on the indicators that someone may be a victim, what support is available to victims and how to refer them to the NRM, whilst also seeking support from the local authority.

[Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](#)

33. Allegations against pupils

If an allegation is made against a pupil, the school will follow the procedures in the Behaviour Policy with regards to sanctions that may need to be applied.

Where there is a risk of significant harm, a child on child referral will be made to Children's Services for either victim, perpetrator or both.

If it is necessary for a child to be interviewed by the police, or other authorities, school will ensure that parents/carers are informed as soon as possible, following advice from external agencies and that the child is supported by an appropriate adult during the interview. The safety and welfare of the child will always be carefully considered by school.

Appendix I

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a child or if a child discloses to them.

The following is intended as a reference for school staff and parents/carers if they become concerned that a child is suffering or likely to suffer significant harm.

The Children Act 1989 defines abuse as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development. Four categories of abuse are identified:

Categories of Abuse

Child abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or 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 persistent 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, though it may occur alone.

Sexual Abuse

Involves forcing or enticing a child 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. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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:

- a) provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b) protect a child from physical and emotional harm or danger
- c) ensure adequate supervision (including the use of inadequate caregivers)
- d) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation is a form of child abuse and may take a number of forms:

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Taken from – **Keeping Children Safe in Education 2023.**

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Taken from “**Keeping Children Safe in Education 2023**”

Extremism

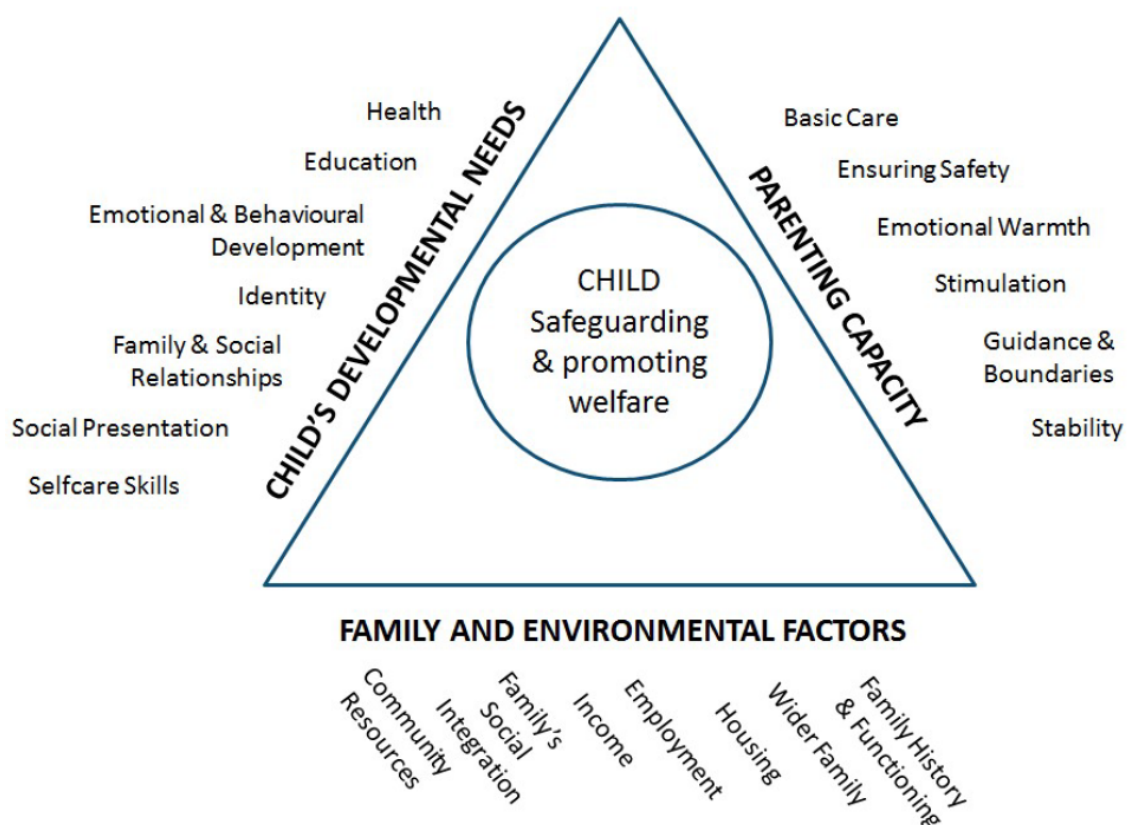
Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Harmful sexual behaviour (HSB)

Children’s sexual behaviour ranges, from normal and developmental expected to inappropriate, problematic, abusive and violent. The inappropriate, problematic, abusive and violent behaviour can cause developmental damage and is referred to as “Harmful Sexual Behaviour” (HSB).

Assessment Framework

(from Working Together to Safeguard Children, July 2018)



Appendix II - Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harms 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.

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

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. Individual will also be supported by Senior Team, HR and trade union representative of their union.
- 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

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.

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

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:

- 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
- Ensuring that adults consistently model the school's values to help keep children safe.
- 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 for staff. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

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

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

References

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

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