



WREKIN
PREP

SAFEGUARDING AND CHILD PROTECTION POLICY

2024 - 2025

Last review: Oct 2024 (Mr Nick Rothwell & DDSL Team)

Date for next review: Oct 2025

SAFEGUARDING AND CHILD PROTECTION POLICY AND GUIDELINES

(This policy applies to all staff, governors and volunteers working in the school.
It also applies to all pupils, including EYFS, at the school)

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This policy is available to parents both on the school's website and as a paper copy on request from the school office.

This policy is written in accordance with inter-agency procedures in line with Telford & Wrekin Safeguarding Partnership (TWSP) which are reviewed and updated on an ongoing basis.

This policy replaces the previous policy of September 2023.

Commitment To Review

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on a yearly basis by the named person responsible below, who shall be accountable for that action.

The Designated Safeguarding Lead (DSL), Nick Rothwell (NR), also Deputy Head, is the person responsible for this policy.

The Nominated Governor for Safeguarding and Child Protection, Rev Matt Beer oversees the school's Child Safeguarding and Child Protection Policy and procedures.

Designated Safeguarding Lead (DSL): Nick Rothwell (NR), also the Deputy Head

Nominated Governor for Child Protection and Safeguarding: Rev Laura Lenander

Deputy Designated Persons (DDP): Mrs Alison Hartland-Griffiths (AHG), Head of Lower School and EYFS & Mrs. Aimee Williams (SENCO)

Cross Trust Safeguarding Adviser (CTSA): Mrs Jill Spence

Contact Details: see Appendix I.

Related School Policies

This policy should be read in conjunction with the following Old Hall School Policies and documents:

- Anti-Bullying and Child-on-Child Abuse Policies
- Positive Relationships and Behaviour
- Code of Conduct for all Staff and Governors
- Complaints Policy and Procedures
- Critical Incidents Policy
- Educational Visits Policy
- Equality and Diversity Policy
- Giving Advice When Answering Questions and Confidentiality of Information Policy (Appendix 6 of this document)
- Health and Safety Policy
- First Aid Policy (includes intimate care)
- Lockdown Policy
- Low-Level Concerns Policy
- Mental Health & Wellbeing Policy
- Missing Child Policy
- Educational Trips Policy and Guidelines
- PSHEE Policy
- Risk Assessment Policy
- Supervision Policy
- Safeguarding Supervision Policy

- Safer Recruitment Policy
- Safer Working Practice Guidance
- SMSC Policy
- Visiting Speakers Policy
- Whistleblowing Policy

Statutory Obligations

The Old Hall School's policy is to follow Government legislative guidelines on safeguarding and child protection. This is contained in the key documentation which is listed in Appendix 2 and copies of which are kept in the DSL's office.

By following the guidance outlined in Appendix 2 the school shows a commitment to good inter-agency co-operation and fully supports the sentiments and actions included in 'Working Together'.

The governing body undertakes an annual review of the school's child protection and safeguarding policy and procedures and of the efficiency with which the related duties have been discharged.

Date Policy Signed Off by the Governing Body:

Review completed November 2024

Date of next review November 2025

Signed by the Head

Anna Karacan

Signed by the Chair of Governors

Mrs Emma Crawford

Document Updates

Date	By	Comments	Location of saved file
Policy re-written August 2018	MCS	The Old Hall School Policy checked against TWSP updated Policy (July 2018) and adjusted accordingly for September 2018.	Resources
Updated 12/3/19	MCS	Following Inspection Scrutiny	Resources and Website
July 2019	RT	Updated with reference to KCSIE September 2019	Resources and Website
September 2019	RT	Updated for Governor review 30 th September, following TWSP (formally T&W SCB) review and updates	Old Hall Resources area of the network and Website
April 2020	RT	Updated, taking into account the impact of the Covid-19 pandemic	Old Hall Resources area of the network and Website
May 2020	RT	Updated, taking into account further changes resulting from the Covid-19 pandemic and the return to school for certain year groups on 1 st June 2020.	Old Hall Resources area of the network and Website

August 2020	RT	Updated with reference to KCSIE September 2020 and further changes relating to Covid-19 pandemic	Old Hall Resources area of the network and Website
August 2021	RT	Updated with reference to KCSIE September 2021	Old Hall Resources area of the network and Website
September 2022	RT	Updated with reference to KCSIE September 2022	OHS network area and Website
September 2023	AG	Updated with reference to KCSIE September 2023	OHS network area and Website
September 2024	NR	Updated with reference to KCSIE September 2024	OHS network area and Website

PART 1: INTRODUCTION

Professionals must combine an open-minded attitude with decisive action, when alleged concerns about a child and from a child are clearly indicated.

The safety and protection of all children is of paramount importance to all those involved in Education (Children Act 1989). There can be no greater issue of importance to parents, or to schools, than the safety of their children; safeguarding, therefore, remains a priority across all aspects of The Old Hall School's work.

Key information about the policy

- This policy applies to ALL pupils (including EYFS) at The Old Hall School.
- This policy is available to parents both on the school's website and as a paper copy on request from the Head's PA.

The Old Hall School will have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015. This policy has been developed in line with legal obligations, including, where applicable, the Human Rights Act 1998, the Equality Act 2010 and the Public Sector Equality Duty.

We will adhere to the statutory guidance [Working Together to Safeguard Children 2018](#) and [Keeping Children Safe in Education 2024 \(KCSIE\)](#). We will follow the DfE guidance of [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#) and [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018](#). We recognise the [NSPCC](#) website also provides additional information on abuse and neglect and what to look out for.

We provide early years provision and adhere to the Statutory Framework for the Early Years Foundation Stage (2024) Section 3 - The Safeguarding and Welfare Requirements.

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

All child protection matters will be dealt with in line with the arrangements of [Telford and Wrekin Safeguarding Partnership \(TWSP\)](#) and [West Midlands Child Protection and Safeguarding Procedures](#) or, if relevant, the safeguarding partnership area in which children reside or of which are under their care.

Staff and Governors' Responsibilities

- All staff and governors must be conversant with this policy.
- All staff and governors are given a copy of KCSIE September 2024.
 - Governors, the Designated Safeguarding Lead and their deputies are expected to read all parts of KCSIE September 2024.
 - All members of staff (teaching and support staff) are expected to read at least Part One and Annex A and B of KCSIE September 2024.

- The Head in conjunction with the DSL will ensure that the policies and procedures, adopted by this governing body/proprietor, are understood, and followed by all staff.
- All staff will undertake Safeguarding training on an annual basis – using Educare modules. All staff will undertake safeguarding training from TWSP on a three-yearly cycle.
- All staff undertake online safety training and will have an understanding of the responsibilities in reference to filtering and monitoring, and CSE training annually.
- Training helps staff to understand local safeguarding procedures. We will maintain a record of training.

Our approach to safeguarding

The governing body will ensure that we facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and our policy development. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart.

At The Old Hall School we embed a safeguarding culture such as:



Where there is a safeguarding concern, the governing body and SLT will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they will be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The staff at Old Hall are an important part of the wider safeguarding system for its pupils.

At Old Hall it is everyone's responsibility to safeguard and promote the welfare of children, this includes everyone who comes into contact with children and their families. Everyone will consider, at all times, what is in the best interest for the child and ensure their practice is child-centred. This responsibility is set out in all staff's job descriptions.

For the purpose of this policy, safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment; whether that is within or outside the home including online;
- 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.

‘Children’ includes everyone under the age of 18.

No one in the school will manage concerns about a child in isolation. **Everyone** will identify concerns, share information and take prompt action.

At Old Hall, staff maintain the attitude ‘it could happen here’ where safeguarding is concerned. Staff must always act in children’s interest where they are concerned about a child’s welfare.

At Old Hall we agree that the safety, welfare and protection of all children is paramount and any delay in reporting concerns is unacceptable. All staff will adhere to this principle and the child protection procedures established by the TWSP and the underlying principles that lie within it.

Our staff will identify concerns early, provide help for children, and prevent concerns from escalating. They will provide a safe environment in which children can learn.

We are committed to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child’s life.

The DSL and their deputies’ role is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

All teachers, including the Head, in accordance with the Teachers’ Standards 2012 will safeguard children’s well-being and maintain public trust in the teaching profession as part of their professional duties.

Staff training and induction

All staff will receive an induction so they are aware of the safeguarding systems. This will include the child protection policy, child on child abuse policy and procedures, behaviour policy, staff behaviour policy, safeguarding response to children who are absent from education and the role of the DSL and CSE lead (including the identity of the DSL and any deputies). They will receive appropriate safeguarding and child protection training to provide them with relevant skills and knowledge to safeguard children effectively. We will provide copies of policies and a copy of Part 1 (or Annex A if appropriate) of KCSIE to all staff at induction. We will maintain a record of induction.

All staff are trained on the indicators of abuse and neglect to help them to identify children who may be in need of help or protection. We believe that abuse, neglect and safeguarding issues are rarely stand-alone events.

At Old Hall staff will never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. No one in the school will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action to help children and families receive the right help at the right time.

All staff will be made aware of the following:

- Telford & Wrekin and Shropshire alongside any other locality early help processes and their roles within them;

- the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 and the role they might be expected to play in such assessments, and
- what to do if a child tells them he/she is being abused, exploited or neglected.

Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and children's social care. Staff will never promise a child that they will not tell anyone about a report of any form of abuse, neglect, and/or exploitation because this may ultimately not be in the best interests of the child. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence, sexual exploitation or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. Staff will record how they have reassured individuals.

A review of this policy is conducted annually.

The Nominated Governor for Child Protection and Safeguarding, Rev Matt Beer, oversees the school's Child Protection and Safeguarding Policy and procedures. The nominated governor will circulate any relevant documentation pertaining to policy change/guidance.

The minutes of the Michaelmas Term Governors' Meeting will show that the Governing Body discussed the report and approved the annual review of the school's Child Protection and Safeguarding Policy and Guidelines.

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in Government Legislation or any changes in the duty of statutory agencies in child protection and wider safeguarding agenda or changes at the school.

Definitions

Safeguarding

Safeguarding and promoting the welfare of children is defined as:

- 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.

Safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests of the child**.

Abuse Neglect and Exploitation

'All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.'

‘All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap’.

KCSIE September 2024

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Staff

For the purpose of this document ‘staff’ include all those in the school community (teaching and support staff), including supply teachers, volunteers, visiting professionals working with pupils in the school and those supporting school visits.

Child

The term ‘child’ or ‘children’ refers to any young person 18 or under, which includes all pupils at The Old Hall School, including EYFS.

Aims of the Policy

- The aims of this school policy are to make all (pupils and staff) within the school feel safe and for the school to have clear roles and responsibilities in place for that to happen.
- The school’s duty of care will be in line with government legislation and the Telford & Wrekin Safeguarding Partnership (TWSP) procedures.
- The protection of children is the responsibility of everyone. Primary responsibility for the care and protection of children rests with parents, but a range of services is available to help them in this task. Many referrals to agencies are made by parents seeking help for themselves. Relatives, friends and neighbours may also directly, or encourage families to, seek help or alert statutory authorities to children about whom they are concerned. All agencies with staff that are in direct contact with children and families must be involved.
- The safety and protection of all children is of paramount importance to all those involved in Education. For avoidance of doubt the role of governing bodies of all schools is set out in KCSIE effective from 1st September 2024. This guidance coupled with Working Together to Safeguard Children July 2018 Chapters 2 and 3 and the areas identified above within the context, is the blueprint for all inter agency working and should be available and accessible to all those responsible for children’s welfare. This school policy reflects the Keeping Children Safe in Education 2024 making it clear to Governing Bodies that staff in all schools and colleges should ensure that all staff in direct contact with children have read at least Part One of KCSIE and signed as such, although best practice would be for all staff to be acquainted with all

five parts of KCSIE 2024. We also acknowledge that Appendix A & B of KCSIE 2024 shall be referred to in all circumstances where further support and advice is required by this school.

At the heart of our policy lies:

- **Prevention** (a positive and talking school, strong pastoral care, careful and vigilant teaching, effective support for children, provision of good adult role models, provision of good senior pupil role models, an effective and robust safer recruitment policy and procedures);
- **Protection** (training of all staff and senior pupils (as appropriate) to be alert in the signs/symptoms which give rise to child protection concerns and how to respond appropriately and sensitively to concerns, following agreed procedures);
- **Support for pupils** who have reported concerns;
- **Support for staff** who have been involved in any investigation

Purpose of the Policy

- Parents/carers need to be in no doubt that this policy is The Old Hall School's commitment towards the statement above and we expect that they embrace everything that is documented in our policy. In principle parents sign up to our school ethos, the law and the legislation that sits behind it.
- Children can develop a special and close relationship with the school's adult community and view them as significant and trustworthy. For the purpose of these policies and for avoidance of doubt, the school community includes all those that work at the school (teachers, support staff and governors) and parents and volunteers that play an active role regularly at the school.
- All of the school community believe that our school should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of the individual child.
- It is not surprising therefore that a child, if they have been abused, may confide or disclose to a teacher or another member of staff. For staff to interpret any concerns, this school will assess each incident as it appears. In respect of assessing any bruising to a child, this school will refer to 'Bruising of Children' guidance produced by TWSP to assist their decision-making.

It is important to note the four defined categories of abuse:

- Physical
- Sexual
- Emotional
- Neglect

Other categories of abuse include:

- Discriminatory
- Financial
- Institutional

But not forgetting **bullying** which can transgress across all four definitions.

The categories can be viewed in KCSIE September 2024 pages 10 & 11 and Appendix 4 of this document.

As a school we also recognise that extremist views in children can be a sign of potential abuse and will be dealt with in the same way as any other concerns children may face whilst in our care. The same principle applies to Domestic Violence, Adults' Mental Health Impact on children, Special Education Needs,

Children With a Disability, Female Genital Mutilation, Honour Based Violence, Child Trafficking, Modern Slavery, Forced Marriage, Suicide Intervention, Young Carers, Children in the Court System, Homelessness, Adoption, Children Returned to their Family from Care, Sexual Violence, Sexual Harassment, Child Sexual Exploitation, Child Criminal Exploitation, Initiation or hazing, Drug and Substance Misuse, Gang Activity, County Lines, Fabricated and Induced Illness - see Part 8 on Children's Welfare. *All our staff will be made aware of all these safeguarding issues that children may face whilst in our care and what steps they need to take if they are aware of them. For avoidance of doubt Annex A of KCSIE 2024 will be referred to for any assistance that the standalone DSL or any other school staff may need in ensuring a child's safety and welfare.*

- Because of the day-to-day interaction with children, members of school staff are also in a unique position to notice
 - Change in demeanour such as a child being quieter than usual, 'clingy' towards staff, withdrawn or not wishing to go home at the end of the day;
 - Change in circumstances;
 - Injuries, marks or bruises when for instance children are doing PE, games or swimming which might indicate a child has been abused.
 -

See Appendices 4 and 5 for further information.

PART 2: THE POLICY

1. Life at The Old Hall School is based upon mutual respect; consideration of others, and of self, have equal value and the promotion of happiness and contentment for all members of the community is reliant upon ensuring that it is provided for each individual child and adult within the school.
2. Child protection is rooted in ensuring that the school organisation, its activities, staffing and procedures are aimed at providing an environment in which pupils feel secure and happy and in which their individual needs are met.
3. We practise safe recruitment in checking the suitability of staff and volunteers to work with children.
4. We endeavour to raise awareness of child protection issues and equip children with the skills needed to keep them safe.
5. Child protection will have the highest priority in the school and as a minimum we will protect pupils from physical, sexual or emotional abuse and monitor to ensure that they are not neglected.
6. We will also provide a range of opportunities and levels of support to enable each pupil to express any fears, concerns or worries that they have either within school or in the home environment.
7. We will support pupils who have been abused in accordance with his/her agreed Child Protection Plan.
8. If a child expresses fears, concerns or worries or makes a disclosure, it will be taken seriously and the child protection procedures will be sensitively instigated, always ensuring that the security, safety, happiness and wellbeing of the child remains the paramount consideration.
9. We will work appropriately with each child, their family and other agencies to protect in all cases the welfare of the child. Furthermore we will work in partnership, support the ethos and abide by the principles of the thresholds guidance produced by Telford & Wrekin within the Family Connect Model; the [Telford & Wrekin Council Threshold Guidance](#) and '[The Child's Journey in Telford and Wrekin](#)'.
10. Furthermore, all school staff will be prepared to identify children who may benefit from early help. For avoidance of doubt, early help means this school will provide support as soon as a problem emerges at any point in a child's life from EYFS to Year 6.
11. Staff within this school may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
12. Staff within this school will also be made aware of the process for making referrals to children's social care and statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Also staff will be made aware of the flowchart from KCSIE 2024 page 24 'Actions where there are concerns about a child' – found in Appendix 10.
13. On occasions the school, where necessary, may be asked to participate in multi-agency meetings and in cases of sexually harmful behaviour/ exploitation (including social media and youth produced sexual imagery known as 'sexting'), and be asked to undertake a risk and vulnerability management plan. This school will use the TWSP's 'Risk and Vulnerability Management Plan - Sexually Harmful Behaviour' to assist them if this is deemed necessary and appropriate, so clear support is in place. This will be recorded and kept under review within school and with other partner agencies. Furthermore, as a school we recognise that children are capable of abusing their peers and it will not be tolerated, and whilst participating in the above processes, the school will not pass off the abuse as 'banter', 'just having a laugh' or 'part of growing up' (See Section 8 on 'Children's Welfare' for more detailed information). Any intervention will consider the victim, alleged perpetrator, all other children and if appropriate adult students and staff. Also we will engage with parents to manage and agree this process for all those involved.

14. Our role is to refer to the information received onwards and **under no circumstances** become the investigator.
15. We also work to Telford & Wrekin SCB procedures for all staff who work with children, where allegations may be made by a child/adult of abuse in any form. All staff will adhere to the procedures drawn up by the SCB in line with national guidelines and supported by the SCB managing allegations against those working with children, where this is managed by the SCB through the Local Authority Designated Officer (LADO). The process for managing allegations can be viewed at <http://westmidlands.procedures.org.uk/>
16. The school will maintain a register of child protection issues and confidential files on individual children known to be, or suspected of being, at risk.
17. The school believes that those who work within the school community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE there is a separate Safe Working Practice (code of conduct), which is issued to all staff and governors.
18. The document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings' produced by the Safer Recruitment Consortium October 2015, <http://www.saferrecruitmentconsortium.org/GSWP%20Oct%202015.pdf> , provides excellent guidance on the expected standards of all those that work with children. This is made available to all staff and will work alongside the separate code of conduct, Safe Working Practice, as mentioned above.

The school's **Code of Conduct** is issued to all members of staff and is available to governors

PART 3: THE ROLES AND RESPONSIBILITIES OF DIFFERENT MEMBERS OF THE SCHOOL COMMUNITY

I. The Head and Governors

- a. The Head and Governors are committed to working together to create and maintain a safe learning environment for the children and young people attending the school.
- b. The Head and Governors will follow the specific guidance as set out in Chapters 2 and 3 of 'Working Together to Safeguard Children' July 2018 and KCSIE September 2024 and will ensure that:
 - The policies, procedures and training are effective and comply with the law at all times.
 - Clear arrangements are in place to encourage, facilitate and support the reporting of child welfare concerns, including instances where pupils are missing from school;
 - A designated person is available at all times whilst pupils are under direct supervision of school staff;
 - Provision is made for appropriate training, induction, support and supervision for designated persons and all other members of the school's community and workforce;
 - The school works with the Local Authority Designated Officer (LADO) and appropriate partner agencies proactively to safeguard pupils;
The school will work with the most appropriate agency linked with the home address and county of any persons concerned.
 - Records relating to safeguarding are kept safely and shared appropriately;
 - Where our school uses alternative provision e.g. residential visit locations, we continue to be responsible for the safeguarding of that pupil. Therefore, the school will obtain written confirmation from the setting that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. (See section 3 KCSIE Safer Recruitment).
 - Appropriate safeguarding policies are adopted, monitored and evaluated which will include:
 - Child protection and safeguarding
 - Staff and Governors' Code of Conduct which includes acceptable use of technology, staff/pupil relationships and communications including social media
 - Bullying, harassment and discrimination
 - Suicide intervention
 - Use of reasonable force and restraint and behaviour management
 - Health and safety including use of equipment and provision of first aid
 - Use of the internet, mobile phones and social networking sites
 - School trips and outdoor activities
 - Drugs and substance misuse
 - Meeting the needs of pupils with special medical conditions
 - Meeting the needs of pupils in managing prescribed medications
 - Intimate care
 - School security
 - Issues which may be specific to our local area or population, for example gang activity, county lines or knife crime, CSE.
 - Whistleblowing - 'Speak Up' Policy
 - The school premises are deemed safe.

- Appointments to staff positions and other roles within the school community are made following the safer recruitment guidance within Part 3 of KCSIE 2024 and all appropriate vetting checks have been completed (see safer recruitment section).
- Safer recruitment training has been completed by appropriate members of selection panels (see safer recruitment section).
- The school's Single Central Record of recruitment and vetting checks covering all staff and others identified by the school as having regular contact with children is kept up-to-date in line with Ofsted/ISI requirements.
- The identity of visitors to the school is checked and a record is made in the online signing in system. They are checked to be suitably identified/badged and are not left unsupervised within the school. Upon signing out, a backup copy of visitors passes is maintained in the office by The Head's PA (Irene Kinchley).

2. The Nominated Governor for Child Protection and Safeguarding (Rev Matt Beer)

The nominated governor for child protection and safeguarding will play an essential role in ensuring children in this school are kept safe from harm. The child protection and safeguarding governor plays an important role in ensuring oversight and scrutiny of the Child Protection and Safeguarding Policy, procedure and practice on behalf of the full governing body. The governors' responsibilities for child protection and safeguarding are ultimately collective ones.

Role of the Nominated Governor: see Appendix 3.

3. The Role of the Designated Safeguarding Lead (DSL)

During term time there is always at least one member of the safeguarding and child protection team available to discuss any safeguarding concerns should they arise.

If the DSL is absent then a Deputy Designated Person (DDP) will act as the DSL. However, the ultimate **lead responsibility** for safeguarding and child protection will remain with the DSL.

The DSL and DDPs form part of a borough wide network of school DSLs, where information is shared, in a two-way process, with the Telford & Wrekin Council LADO (Designated Officer: KCSIE 2024) and Safeguarding Children in Education Officer.

The DSL acts as the focal point for all matters concerning safeguarding children and young people. One of the primary tasks is to act as the contact between school, the family and other agencies.

Responsibilities:

Manage Referrals

1. The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;

- Refer to family Connect (Telford), FPOC (Shrewsbury), Wolverhampton family support hubs (Wolverhampton) or Staffordshire Children's Advice and Support (SCAS)
 - Refer cases to the Channel programme where there is a radicalisation concern as required;
 - Support staff who make referrals to the Channel Programme;
 - Work alongside the Head to refer cases where a person is dismissed, or leaves owing to risk/harm to a child, to the Disclosure and Barring Service as required;
 - Refer cases where a crime may have been committed to the police as required.
2. The DSL has direct referral links with the **Social Care Safeguarding Advisors & Safeguarding Team via the Family Connect Team 01952 385385** (or other relevant local authority Children's Social Care). For avoidance of doubt the DSL should be the point of contact with regard to referring a child if there are concerns about possible abuse. A formal [written request for service](#) (Telford & Wrekin School SCB link to formal request) should not delay a verbal discussion so that immediate action can be taken if necessary. However, any referral should be confirmed in writing within 48 hours.
 3. The DSL must make it clear to all staff that **if the DSL or someone from the Senior Leadership Team is not available, then this should not delay in sharing any concerns about a child** to the Safeguarding Advisors Team via The Family Connect Team on 01952 385385. However, this school will ensure that as far as is possible there is always a nominated cover presence on site for Safeguarding and Child Protection issues during school hours and that the DSL is contactable out of hours.

E-Safety and Online Safety

4. E-safety is an important aspect of safeguarding and child protection. The school is committed to improving safety for its pupils through the above and through e-safety training for pupils and providing updates for parents. The DSL works alongside key personnel to monitor online safety and training in school. For further details see Part 4 of this document.

Records

5. The **DSL keeps all written records of concerns about a child** even if there is no need to make an immediate referral for action; this will include any online misuse issues that may cause indirect abuse to a child. Online safety will be treated as any other form of abuse and recognition that bullying can transgress across all four defined categories of abuse including bullying and harassment;
6. The DSL will ensure that **all such records are kept confidentially and securely** and are separate from pupil records, ensuring that an indication of further record keeping in terms of child protection is marked on the pupil's records. Use of CPOMS for such records, unless any historic notes have been handed to the School's DSL in person.

Work with others

7. **The DSL will act as a point of contact with the three safeguarding partners;**
8. The DSL will liaise with the Head to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
9. The DSL will, as required, liaise with the 'case manager' (i.e. the person who initially holds the information from whatever source - the Head or the Chairman of Governors) and the LADO in cases which concern a member of staff;

10. The DSL will liaise with staff (especially pastoral support staff, the School Nurses, ICT Technicians and Support for Learning) on matters of safety and safeguarding (including e-safety and online safety) and when deciding whether to make a referral by liaising with relevant agencies;
11. **Multi-agency working:** The governing body and the DSL are familiar with the TWSP arrangements. They will engage with the TWSP as required. They will follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the child resides to follow the local protocol for assessments. The governing body expects the staff to work with social care, the police, health service and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will always contribute to multi-agency plans to provide additional support to children subject to child protection plans. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.
12. The DSL will ensure that information regarding any pupil currently subject to a Child Protection Plan and deemed 'at risk', who is **absent without explanation for two days**, is shared with Children's Services Family Connect Safeguarding Team (or other relevant local authority Children's Social Care).
13. The DSL will notify Children's Services Social Care Safeguarding Team if the school should have to **exclude a pupil who is the subject of a Child Protection Plan** (whether fixed term or permanently).
14. The DSL will act as support, advice and expertise for all staff.

Training and Raising Awareness

15. The DSL and deputies will have received training (updated at least every two years) to provide them with the knowledge and skills required to carry out the role and will liaise in accordance with the Telford & Wrekin SCB procedures and Telford & Wrekin People Services Team procedures. It is the professional responsibility of the DSL's to update their own training gaps/needs with enhanced updates and training which are held throughout the year and regularly offered by the Telford & Wrekin SCB, conferences/workshops offered by private providers and other mainstream providers. If in doubt, KCSIE September 2024 Annex C should be referred to for clarification about the role of DSL's. The Role of DSL's and their Deputies is made explicit within Job Descriptions.
16. The **DSL and deputies will ensure that they have received training and are confident in dealing with online safety issues.** It is the responsibility of the DSLs to assess their own confidence and skill set and to ensure that they have the skills to support and report if need be. It is recognised that online safety is an ever changing process and any information that is cascaded down should also be shared on a whole school basis if it is of generic content, such as new and existing social media applications that may be harmful to a child's welfare.
All staff should be conversant with the school's E-Safety and Online Safety Policies.
17. The DSL will have due regard to safeguarding incidents and/or behaviours that can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life

that are a threat to their safety and/or welfare. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) child sexual exploitation, criminal exploitation, and serious youth violence. Children's social care assessments should consider such factors so our school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

18. The DSL will ensure that all **staff have received appropriate child protection training** within the advised timescales. These staff will include full time, temporary and volunteer staff.
19. The DSL will make known to the whole school community **the location of the Telford & Wrekin SCB** website address <http://www.telfordsafeguardingboard.org.uk> where the policies & procedures are on view; these are regularly reviewed and updated by the Telford & The Old Hall School SCB.
20. The DSL will ensure that all new members of staff will have **completed an induction** to child protection and safeguarding systems within the school and satisfy themselves that the member of staff understands their responsibility for sharing a concern and with whom. Furthermore, all staff will receive regular safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) to provide staff with relevant skills and knowledge to safeguard children effectively. This will also allow staff to contribute to and shape safeguarding arrangements and child protection policy.
21. **All school staff will be given a copy of the school's Safeguarding and Child Protection Policy** (which explicitly refers to processes in school where there may be concerns for a child's welfare and how to respond); the school's **Behaviour and Discipline Policy**, Part 1 of **KCSIE 2024**, **a copy of the flowchart from KCSIE 2024** page 22 'Actions where there are concerns about a child' (Appendix 10 of this document) and Annex A & B of KCSIE 2024.
22. **We ensure that the child protection policy is available publicly** (school's website) and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the school's role in this.

The DSL preserves a distinction between children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies.

When making a referral to the local authority the DSL contacts the relevant service for the child's home locality. For avoidance of doubt the Designated Person(s) should be the point of contact with regard to referring a child if there are concerns about possible abuse. A formal written referral should not delay a verbal discussion so that immediate action can be taken if necessary. However, any referral should be confirmed in writing within 24 hours.
Contact details for all services Family Connect: see Appendix 1.

4. The Staff

- All those in the school community, including supply teachers, visiting professionals working with pupils in the school are informed of the name of the DSL's and the school procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures:
 - During their first induction to the school.
 - Through a copy of this policy

- All members of staff are required to be alert to signs of abuse. They should report any concerns or suspicions if not immediately, as soon as possible, that day to the DSL. If in doubt they should talk with the DSL, **delay is unacceptable**. Staff will also record how they have reassured individuals.
- We recognise that children cannot be expected to raise concerns in an environment where colleagues fail to do so. All of the school community should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Unacceptable standards, conduct or behaviour should be challenged appropriately at the outset, and will not be tolerated. A separate code of conduct policy has been adopted by this school.
- The school's 'Whistleblowing Policy' covers raising concerns. However, where staff feel that they cannot report a concern through the above channels general guidance can be found at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>. The NSPCC Whistle Blowing Helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk
- Provision to view the Telford & Wrekin SCB website should be made accessible to all staff. In the first instance if computer access is needed this should be requested through the DSL

All staff may also refer a suspected case of abuse directly to the relevant safeguarding board. Contact details can be found in Appendix I. If a member of staff does inform the relevant safeguarding board directly, they must inform the DSL that they have done so.

5. Pupils

Children sometimes tell their peers, rather than staff or adults, about abuse. The children at school are regularly reminded of who they can talk to if they have any concerns or worries of their own or about others. They are encouraged to share their concerns and are reminded that their concerns will be treated seriously. All classrooms should have a poster with pictures of the DSL team to make them aware of who they should contact. Teachers will also discuss what they should do when they have a concern.

PART 4: RECRUITMENT, INDUCTION, TRAINING AND ONLINE SAFETY

Safer Recruitment

We will meet all requirements as set out in Part three: Safer recruitment KCISE.

We commission Kirsty Morris (Wrekin and Old Hall Trust) human resources, to assist in the management of safer recruitment procedures.

Please see our safer recruitment procedures.

Recruitment and selection process

We aim to create a culture that safeguards and promotes the welfare of all children. As part of this culture, we will adopt robust recruitment procedures that help to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our setting.

We will ensure that **all** those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training (Educare module).

The following persons have completed safer recruitment training in our setting:

The Old Hall SLT plus Gillian Dipenaar, Kirstie Morris and Claire Pritchard

Pre-appointment vetting checks, regulated activity and recording information

We will abide by the legal requirements when appointing individuals to engage in regulated activity relating to children. We understand the importance of ensuring the correct pre-appointment checks are carried out. These checks will help us to identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). We see this as part of our wider safeguarding regime which will carry on following an appointment.

Other checks that may be necessary for staff, volunteers and others

We will carry out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. We will fulfil our responsibilities in relation to other settings, including alternative provision, work experience and host families.

Visitors

We have different types of visitors, those with a professional role, those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity.

We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteacher/CEO will use their professional judgement about the need to escort or supervise such visitors.

For visitors who attend our setting in a professional capacity we will check their ID and seek assurance that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). We will not ask to see DBS certificates.

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help us enrich children's education; careful consideration will be given to the suitability of any external organisations.

Adults who supervise children on work experience

When organising work experience placements, we will ensure that the placement provider has policies and procedures in place to protect children from harm.

Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. We will consider the specific circumstances of the work experience and give consideration in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30- day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, we may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

1. The recruitment process includes:

- An enhanced DBS check;
- Prohibition from teaching check;
- A check against the DBS list of those who are barred from working with children;
- A check that they are not prohibited from working with children;
- Right to work in the UK check;
- A section 128 (prohibition from management) check if relevant;
- Further checks on people who have lived or worked outside the UK - including checks for European Economic Area (EEA) teacher sanctions.
- Internet search.

There is a separate school Recruitment Policy and Procedure.

Reference to this process can be viewed at www.gov.uk

2. Induction

Every new member of teaching staff, support and volunteers, peripatetic musicians and sports coaches, is required to attend a training session on safeguarding and child protection. Educare login details will be provided and copies of staff certificates will be kept by the DSL.

The training includes:

- Identity and contact details of the DSL and designated persons
- Their personal responsibility
- Familiarisation with this policy which includes:
 - The categories of abuse, signs and symptoms, the need to be vigilant and to respond to a child who tells of abuse;
 - How to support and respond to a child who tells of abuse;
 - How to report their concerns and/or suspicions and how to receive, record and report disclosures, including child on child sexual violence and harassment;
 - That the school has a culture of listening to children and taking account of their wishes
- The provision to view the TWSP website is made accessible to all staff
<https://www.telfordsafeguardingpartnership.org.uk/site/index.php>);
- Familiarisation with the Safer Working Practice (Staff Code of Conduct) Policy – including the procedure for reporting a wrong-doing (Whistleblowing)
- Requirements to read Part I and Annex B of KCSIE September 2024 and to complete the declaration that they have read and understood the document.
- If in doubt they should talk with the Designated Person(s), delay is unacceptable;

Members of staff are also able to access the following school policies:

- Anti-Bullying and Child-on-child Abuse Policies
- Positive relationships and behaviour Policy
- E-Safety and Online Safety Policies
- Safe Working Practice Policy (Code of Conduct)
- Whistleblowing Policy

Members of staff are asked to complete a declaration to say that they have read and understood the above.

3. Training of Staff and Volunteers

Level 1 training is given to ALL teaching staff, governors, support staff and volunteers.

Level 1 training for teaching staff is at TWO yearly intervals

(new members of the teaching staff join the support staff rolling programme of training).

Level 1 training for support staff and governors is at THREE yearly intervals – rolling programme.

Regular Safeguarding Updates and Training during the course of the year as and when needed and at least annually.

PREVENT - WRAP 3 Training was completed September 2015 – all staff). This was updated where all staff Staff completed the EduCare online E-safety training in January 2020. Staff joining the school since September 2020 are required to complete the online EduCare Prevent training at the start of each academic year or on joining the school (Nick Rothwell is the PREVENT DUTY officer at Old Hall School).

4. Nominated Governor Training

The nominated governor will ensure that they have received Safer Recruitment training and child protection training and will also ensure that the Governors are informed on any safeguarding training that is required.

5. The Designated Persons' Responsibilities and Training

- To ensure that they have received **child protection training** with refresher training at TWO yearly intervals as a minimum.

NR - Completed a two-day course with T&W 1st- 2nd May 2024
AW - Completed a two-day course with T&W 27th – 28th September 2023
AHG – Completed DSL refresher training 22nd July 2023
- It is the professional responsibility of the Designated Person(s) to update their own training gaps/needs with updates, which are held throughout the year and regularly offered by Telford & Wrekin SCB and other mainstream providers.
- **The DSL should receive appropriate training every two years in order to:**
 - Understand the assessment process for providing early help and intervention;
 - Have a working knowledge of how the local authority conducts a Child Protection Case Conference and a Child Protection Review Conference and be able to attend and contribute to these effectively when required to do so;
 - Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff;
 - Be alert to the specific needs of children in need, those with special educational needs and young carers;
 - Be able to keep detailed, accurate, secure written records of concerns and referrals;
 - Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.
- **The DSL should receive additional updates to their knowledge at regular intervals, but at least annually.** TWSP email updates to the DSL throughout the course of the year.

Details of individual staff safeguarding and child protection are held by the DSLs for The Old Hall School and or Wrekin College (Wrekin Old Hall Trust)

The DSL keeps a record of the Designated Persons' training.

Curriculum and Wider Activity in Keeping Children Safe

- Pupils receive guidance on how to keep themselves safe through the school's PSHEE programme, of which Health and Relationship Education (as per the [Statutory guidance: relationships education, relationships and sex education and health education](#)) forms a part, and the use of outside professionals, for example, the Police Community Support Officers attend school to work with children on a programme which deals with peer pressure, drugs, alcohol and personal safety.
- The children are also regularly trained in Online-Safety using CEOP resources during IT lessons.
- There is a separate PSHEE Policy and Relationships Education Policy.

E-Safety and Online Safety

All staff should be conversant with the school's separate Online and E-Safety Policy

The DSL is responsible for understanding the online security/filtering system and liaise with IT support staff Paul Saddler and Steve Morton in order to conduct regular IT scan for all Old Hall users and notify the DSL of any issues.

- Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion. Any monitoring software that is used within the school will be reviewed and checked regularly. It is recognised at this school that all information technology, whether personal or work based, is a whole school issue and all staff have a duty to be vigilant. Telford & Wrekin SCB has issued guidance 'Raising Awareness in the Safe Use of ICT Systems.'
- All within the school community must adhere to the school's Acceptable Use Policy and Online Safety Policy. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.
- On occasions unacceptable websites might be accessed inadvertently; if this occurs then the site will be closed immediately and the incident will be logged and reported to the DSL and ICT Team.
- E-safety is an important aspect of safeguarding and child protection. The school is committed to improving safety for its pupils through the above and through e-safety training for pupils and parents. E-safety is part of the ICT Department's Scheme of Work.
- It is recognised at this school that all Information Technology, whether personal or work based, is a **whole school issue** and all staff have a duty to be vigilant.
- Online safety is a growing and complicated area of concern for all agencies. This school recognises that staff need to be aware that children with Special Education Needs and Disabilities (SEND) are particularly vulnerable and the unique risks associated with online safety because of their SEND recognition. That is not to say that the headteacher does not apply to any other children in our care. However, in light of the heightened vigilance needed in school for all, the links below will be made aware to staff in the quest for them to be confident to keep children safe online whilst they are at school. By doing this we wish staff to recognise the additional risks from online bullying, grooming and radicalisation and giving staff the capability to support all children.
- The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation, sexual predation. Technology often provides the platform that facilitates harm. An effective approach to online safety empowers this school to protect and educate the whole school community in our use of technology and we will work with our Information Technology partners to identify, intervene in and escalate any incident where appropriate. **Parents need to be in no doubt and support us in and out of school and be aware of this to assist us with effective online safeguarding. We CANNOT do this alone.**
- The breadth of issues classified within online safety is considerable:
 - **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, fictional inaccuracies from AI software, racist or radical and extremist views;
 - **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults and
 - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).
- Online safety is a major concern for all professionals not only Social Media forums but issues around youth produced sexual imagery known as 'sexting' (see the school's separate policy on this).
- Online safety training for all staff is available and staff are encouraged to participate as appropriate.
- The [Online Safety Audit Tool](#) is used to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.
- The school also makes use of available resources to support the way we endeavour to keep children safe online:
 - o DfE advice for schools:
 - o UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
 - o National Crime Agency's CEOP education programme: [Thinkuknow](#)
 - o Public Health England: [Rise Above](#)

Reviewing online safety

Technology in this area evolves and changes rapidly. A free online safety self-review tool for schools can be found via the [360 safe](#) website. UKCIS has published [Online safety in schools and colleges: Questions for the governing board](#) to help responsible bodies assure themselves that their online safety arrangements are effective.

Education at home

Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: [safeguarding-and-remote-education](#).

For more information and support in these areas the following websites are available for all staff and parents to view. The sites are for all age groups, parents and carers, which will form the basis and assist with e-safety education, support and policy in our school:

<http://swgfl.org.uk/>
www.thinkuknow.co.uk
www.ceop.gov.uk
www.virtualglobaltaskforce.com
www.parentsprotect.co.uk
www.lucyfaithfull.org.uk

Taking Photographs in Schools

No Personal Cameras or Phones may be used within the Reception Class/EYFS setting to record images. Only school devices may be used to photograph children or record activities for school use.

- Good practice guidance from the Information Commissioner's Office on taking photographs in educational institutions will be followed. This is attached for information. In the interests of safeguarding a common sense approach on a case by case basis will be taken in this area. A full copy of the guidance can be viewed at <https://ico.org.uk/for-organisations/advice-for-small-organisations/whats-new/blogs/taking-photographs-data-protection-advice-for-schools/#:~:text=People%20can%20take%20photographs%20and,case%20it%20disturbs%20the%20performance>.
- Our school and its staff will under **no** circumstances photograph injuries seen on children. Staff in schools are not Crime Scene Investigators nor are they trained to the standard of hospital photographers.

These experts are the only people who should be photographing injuries. Professional Crime Scene Investigators who undertake injury photographs present their evidence at court as an expert witness. School staff are not expert witnesses.

- If the concern is around non-accidental injury, then that is a matter that requires immediate attention on the day resulting in an appropriate referral to the appropriate safeguarding board. The appropriate Safeguarding professionals will control getting the process of photographic evidence gathering underway and assessment.
- We will, as a school, make sure staff should record all visible injuries on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

PART 5: HEALTH AND SAFETY AND PHYSICAL INTERVENTION TO PREVENT HARM

Health and Safety policy can be viewed separate to this policy. Physical intervention to prevent harm to the pupil, other pupils or staff is only ever used as a last resort.

Use of Changing Facilities

- Where this school considers arrangements for safe changing of children for PE and in respect of recommendations from Serious Case Reviews, this school will consider the NSPCC document 'Best Practice for PE Changing Rooms'. This consideration will come under our duty and remit of Health & Safety and in the context of children's welfare. Any individual school policy stance will take this best practice guidance into account. The guidance includes: what we as a school need to consider when organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations where drama productions require careful planning and additional thought is given to using off-site changing rooms. [NSPCC factsheet](#)

Use of Reasonable Physical Intervention to prevent harm

- For avoidance of doubt for parents and the whole school community, there are occasionally circumstances when it is appropriate for staff in school to use 'physical intervention' to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be retrained to prevent violence or injury to themselves or others. For avoidance of doubt reasonable force will only be used where de-escalation processes have failed and it is the last resort to prevent any harm to the individual or others.
- When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, this school will consider the risks carefully recognising the additional vulnerability of these groups. This school will consider our duties under the Equality Act 2010 where we make reasonable adjustments, non-discrimination and the Public Sector Equality Duty. This school will, by planning positive and proactive behaviour, support by drawing up individual behaviour plans, when necessary, for more vulnerable children and agreeing them with parents and carers. By doing this the school will as far as is possible reduce and minimise the occurrence of challenging behaviour and the need to use reasonable force.
- 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. The Department for Education believes that the adoption of a 'no contact' policy at a school can leave staff unable to fully support and protect those in their care. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances (see link below)
- <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

PART 6: REPORTING AND RECORDING CONCERNS ABOUT A CHILD RESPONDING TO A CHILD SHARING A CONCERN

Safeguarding is the responsibility of ALL members of our community

Concerns about a child

The DSL preserves a distinction between children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies.

Professional Curiosity

Staff should be **professionally curious** and share concerns. Staff should also be aware that:

- Children might not be ready or know how to tell someone about abuse they've experienced.
- Children might not recognise their experiences as harmful.
- They might be embarrassed, humiliated or threatened not to tell anyone about their abuse.
- Their vulnerability, disability, sexual orientation any language barriers could also be reasons why they don't tell someone about their experiences.
- The barriers above should not stop staff being professionally curious and sharing any concerns they have about a child with the designated safeguarding lead.

What should staff do if they have a concern about a child?

If a member of staff has concerns about any child or incident that touches upon safeguarding or child protection issues, he or she **MUST NOT** contact the parents and **THE FOLLOWING PROCEDURE MUST BE FOLLOWED**:

- The DSL/Deputy Head (NR) should be contacted immediately or in their absence the DDP (AHG or AW), or The Head (AK) or The cross trust safeguarding adviser (JS), as soon as possible, no later than the end of the morning or afternoon session of that day. If the incident is specific to the Early Years then this should be directed to Head of Lower School (AHG) - or in their absence follow the above procedure.
- Where possible there should be a conversation with the DSL to agree a course of action.
- Referrals are usually managed by the DSL. However, anyone can make a referral to Children's Social Care, via Family Connect, MASH, FPOC, SCAS.
- If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible.
- A written report should be made and should include the information revealed by the child using their words as best as possible, when the disclosure was made, to whom the disclosure was made and action taken. See details elsewhere in this document under 'Record'.
- In certain circumstances the Police may need to be called: for example, in known cases of Female Genital Mutilation which is a criminal offence and where reporting is mandatory.

Data Protection

Data protection fears **MUST NOT** be a barrier to information sharing, as the safety of the child is of the utmost importance.

Staff should be conversant with the school's Data Protection Policy.

Disclosure – Immediate Response to the Child and Recording

It is vital that our actions do not cause further distress to the child or prejudice an investigation.

The priority is to protect the child.

No member of staff should offer any child confidentiality in matters which could or have affected the child's physical, social, emotional or sexual wellbeing.

Having made this point it is important to ensure that pupils who have learning difficulties, communication or emotional problems are provided every opportunity and means to express themselves and to do so in a framework characterised by security and support.

R E C E I V E	<ol style="list-style-type: none"> 1. DO NOT promise confidentiality, reassure the child that they have done the right thing, explain whom you will have to tell (the DSL) and why: and, depending on their age, what the next stage will be; 2. LISTEN: it is our role to listen not to investigate; 3. If you are shocked by what is being said, try not to show it; 4. It is fine to observe bruises but not to ask a child to remove their clothing to observe them; 5. The pace should be dictated by the child, without the child being pressed for detail or by asking leading questions such as “what did he/she do next?” or “where did he/she touch you?”
R E A S S U R E	<ol style="list-style-type: none"> 6. Reassure the child that they are right to tell and are not to blame; 7. Be honest - do not make promises that you cannot keep, such as “I’ll stay with you all the time” or, “It will be all right now”; 8. Try to alleviate feelings of guilt by saying, “You are not to blame” 9. Acknowledge how hard it must have been for the child to tell you. 10. Be careful not to burden them with guilt by asking “why didn’t you tell me this before?”
R E A C T	<ol style="list-style-type: none"> 11. Do not ask leading questions. 12. Let the child tell you what they want to and no more; 13. Use open questions such as, “Is there anything else you want to tell me?” or comments such as, “yes?” or “and?” 14. Accept what the child says. 15. Do not criticise the alleged perpetrator; the child may have warm feelings for them, but merely wishes any abuse to stop; <p>Following the disclosure:</p> <ul style="list-style-type: none"> ▪ When the child has finished, make sure they feel secure; ▪ Explain what you are going to do next; ▪ The welfare of the child is paramount. Contact one of the designated persons immediately if you feel that the child should not be left alone: he or she will ensure that the child is looked after. ▪ Record the disclosure – see below ▪ Inform the DSL or DDP straight away.

R E C O R D	<ul style="list-style-type: none"> • Make some brief handwritten notes at the time or immediately afterwards. Record the date, time, place and context of disclosure or concern, recording facts, who you shared them with and not assumption, supposition or interpretation; • Record where you spoke with them and personal safety details such as ‘I discussed the incident with the child in the Deputy Head’s office with the door open’ or justify if it were closed, but naming those who you told this to be the case. If alone, reason that rationale stating ‘the child stated they would only confide in me if I was alone’; • If you observe bruising or an injury try to record detail, e.g. ‘right arm above elbow’, ‘bruise noticed on fleshy part of leg’; • Note the non-verbal behaviour and the key words in the language used by the child (try not to translate into ‘proper terms’ ensuring that you use the child’s own words). Body language should be noted and support any disclosure. • All staff records must be passed on to the DSL for storage and action; • All staff will record how they have reassured individuals.
S U P P O R T	<ol style="list-style-type: none"> I. Get some support for yourself, without disclosing confidential information about the child to a colleague(s). Receiving a disclosure can be an upsetting experience. The DSL will help you to find the support that you need.

The member of staff may now withdraw from the immediate process but should remain vigilant.

It is not appropriate to talk to the child or to support further. However, when a pupil has trusted a member of staff enough to disclose, they may feel the desire to return to talk (remember that investigations can sometimes take months). In such a situation they should be told (sensitively and in an age appropriate way) that you cannot comment or advise as to do so may affect their security and safety both in the short and long term – however, you can listen!

Any discussion could be misused in court by the defence lawyers as evidence against the teacher and the child.

Parents of a child who has made a disclosure may be contacted directly by the DSL or in his absence, DDP or another member of the SLT. Staff must not discuss disclosures with parents unless specifically authorised to do so by the DSL.

Any difficult situations must be referred to the DSL immediately.

See also Appendix 6: Advice when answering questions and confidentiality policy.

Unconfirmed Worries About Possible Child Abuse

- Very often members of staff have unconfirmed worries about pupils, but little real evidence, and so feel unsure about how to proceed. Many cases have shown that these unconfirmed worries are in fact the tip of the iceberg; that if information from one member of staff was placed alongside that of another professional then there may be a serious cause for concern.

- It is therefore vital that even vague 'worries' are passed on at the earliest stage to the designated members of staff who are in a position to evaluate the information and to involve other agencies as appropriate.
- Incident sheets should be completed with staff clearly identifying what is fact and what is opinion.
- Any unconfirmed worries should be recorded on an Incident Report Form. All incidents, suspicions or concerns should be recorded, dated and signed and passed on to the DSL.

Support for all Children - The Role of Designated Staff

- Any children identified with extra vulnerability in their lives are prone to more peer group isolation than other children. They will be made aware of the school's pastoral system, who they can talk to about concerns and will be offered extra support as required. Especially vulnerable are the areas of Special Educational Need (SEND), Care Leavers, Children with a Disability, Children in Care and those experiencing any form of abuse.
- The DSL and along with any Designated Teachers will also have any details of the local authority Personal Advisors so that they can assist within the setting and onto transition. The DSL will liaise with the appropriate person when the child leaves the school's setting, sharing full information of the Child's Journey (see the link on page 10 of this document).
- Recognition that a child who has seen, heard or experienced the effects of abuse and violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child may feel self-blame and we will ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Recognition that the school may provide the only stability in the lives of children who have or who are at risk from harm. The school community will therefore establish an ethos where children feel secure and are encouraged to talk and are always listened to.
- Acceptance that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Health Education (HE) curriculum gives opportunities which equip children with the skills they need to stay safe from harm.
- Our policy on bullying, child-on-child abuse and racist incidents is set out in separate documents and acknowledges that to allow or condone bullying or racism may lead to consideration under child protection procedures. These will be documented like all other incidents. Any bullying, whether racist, emotional, physical, sexist, homophobic, extremist, cyber or in any other forms will not be tolerated under any circumstances.

PART 7: SAFEGUARDING AND CHILD PROTECTION RECORDS, CONFIDENTIALITY OF INFORMATION, SHARING OF INFORMATION AND COMMUNICATION WITH PARENTS

Records

All members of staff are required to record accurately information that might be required in respect of child protection.

Records are not to be kept in the child's normal record file.

Record Keeping and Sharing of Information

- a. Old Hall recognises that information is vital in identifying and tackling all forms of abuse and neglect. The governing body expect all staff to share information with practitioners and local agencies. We are committed to sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child already known to the local authority children's social care.
- b. All records are retained in a 'Child Protection' file, separate from the child's main file (records prior to March 2020) and within CPOMS (from March 2020). This is securely locked away on the premises and only accessible to the Designated Persons, who are responsible, accountable, documented and are identifiable within our school for total security at the setting.
- c. Also, procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Withdrawal of child protection records from the school by staff will be noted and signed for, as will files released to professionals.
- d. The records are reviewed annually by the DSL and checked to be chronological, tidy, legible (where appropriate as in the case of a child disclosure in writing) and, where appropriate, factual in content, as records may sometimes be immediately required by professionals.
- e. The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.
- f. Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidentially.
- g. In respect of files being released when requested by the Police under [Section 29 of the Data Protection Act 2018 a form entitled "Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6\(1\)d\)"](#) should accompany that release and a copy will be retained for our records. Also we will consider the [Z Golden Rules for Information Sharing](#). This school will also seek advice and adopt HM Government Information Sharing Advice July 2018: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- h. If in any doubt we will seek advice from the staff members who are responsible for the Trust's Data Protection: Pete Stanway (Assistant Head Planning) pstanway@wrekincollege.com, David Brown (Bursar), dbrown@wrekincollege.com and Steve Morton (IT Manager), smorton@wrekincollege.com. However, all staff must treat all pupil information in a confidential manner.
- i. Before releasing and sharing records to professionals, the school will request ID Badges for release and records will be signed for.

- j. No named statistics in relation to child protection are a part of performance information. The DSL will inform the Head and the governing body of how the school is coping with child protection issues on a regular basis.
- k. The school reserves the right to withhold files where it deems it appropriate in the best interests of the child. In such cases the school will seek advice from Telford and Wrekin SCB.
- l. In our management of information sharing we will use the following:
 - Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing;
 - [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful;
 - [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.
- m. Staff will be told in their separate team meetings of present child protection concerns that impact on their work. This will be the duty of the DSL. Such updates will take place on a termly basis or as a new concern is identified.
- n. Safeguarding issues is on the agenda of staff meetings and SLT meetings.
- o. Access to the detailed child protection files will be through the DSL. Requests for access should be limited to those staff that have a direct involvement with the pupil and those who need to know more about the circumstances.
- p. Should the school's DSL be subject to allegation or suspicion then the Head (or Deputy Head if the DSL is the Head) or Deputy Designated Person will take over the role of the DSL.

In cases of alleged child abuse, which goes to court, child protection records may be required by the court. Information required by the court should be given to the officers of the court and not to other persons who may use it as evidence. It is not necessary for other background information on the child to be released; this can only be done with parental permission.

In all cases which involve the death or serious harm to a child when abuse is confirmed or suspected, the LSCB will require swift response to requests for information from all agencies including schools. Records must be made available to the Case Review Committee – this further emphasises the need for precise and secure keeping of records. In addition, interviews within the Education department involving key personnel may be required, in order to assess the quality of decisions made and actions taken.

When a Child Transfers to Another School

If a child is subject to a Child Protection Plan and deemed at risk, the child's key worker within Children's Social Care will be contacted by the DSL.

- When a child changes school within or outside the authority, all child protection records will be passed on to the DSL of the next educational setting by the current DSL/DDP or Head, or to Children's Social Care within the authority, if the child is transferring to another authority. This will be done as soon as possible (ideally within five working days of the child starting at their new school or college), ensuring secure transit, and confirmation of receipt will be obtained.
- The DSL, if thought appropriate, may wish to share relevant safeguarding information in advance of new children arriving if they need continuing support e.g. in response to sexual abuse.
- The Old Hall School, in this process, **will not** photocopy and retain child protection records as this is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018 (DPA 18), but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes. This would be deemed as best practice. We

will follow Telford & Wrekin Workbook Guidance (see point 'b' on the previous page) in all circumstances where we need to or seek advice from our Data Protection Officer.

- **The school will ensure:**

- That the new school receives all the necessary information relating to that child as soon as possible;
- That the child protection file is transferred separately from the main pupil file;
- Secure transit of the child protection file;
- That it has received written acknowledgement of the safe transfer of any child protection documents see Appendix 11.

- The school will inform the Attendance Pupil Tracking Officer when a child of compulsory school age leaves the school or is enrolled at the School. ie we notify our local authority when we remove or add a pupil's name to the admissions register at non-standard transition times. See Appendix 1 for contact details.

Retention of Children's Files

All schools must keep educational records on their children. These should include:

- Copies of the reports which have been sent to parents/carers on the child's achievements, as well as other records about those achievements;
- Exchanges of non-routine correspondence between parents and the school;
- Any information the school has on the child's education from the local authority;
- Any statement of special educational needs;
- Any personal educational plan.

There may be other records kept like details of attendance, exclusions, behaviour and family background. This is not compulsory but would be viewed as 'best practice'. The educational record does not include the notes that a teacher makes for his or her own use.

The Child Protection File is a separate file to the educational records.

The school will adopt guidance from the Telford & Wrekin Workbook for Designated Safeguarding Leads and Governors/Committee Members/Trustees/Proprietors, with responsibility for safeguarding, incorporating; Advice note on Child Protection record keeping.

Further information is available via: www.education.gov.uk and www.direct.gov.uk

Confidentiality

All staff at The Old Hall School should be conversant with the school's Data Protection Policy.

Data protection fears MUST NOT be a barrier to information sharing, as the safety of the child is of the utmost importance.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff should seek advice from a Designated Person, or the school's Data Protection Officer or outside agency as required.

- If abuse is suspected, information should be given directly to a Designated Person(s) for child protection or, in their absence, to another member of the Senior Leadership Team.

- The personal information about all families is regarded by those who work in this school as confidential. All staff need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality in all areas of the school.
- Staff should understand they need to know only enough to prepare them to act with sensitivity to a child and to refer concerns appropriately. It is inappropriate to provide all staff with detailed information about the child, the incident, the family and the consequent actions.
- Members of staff have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies.
- If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the welfare of that child.
- Within that context, the child should however be reassured that this will be shared on a “need to know” basis. If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised. Further details on information sharing currently viewed at <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- The Head or Designated Persons will disclose any child protection information about a pupil to other members of staff on a need to know basis only.

Whilst adhering to the principle of limiting the spread of information to the minimum number of people, at The Old Hall School all staff closely involved with a child, for whom there are child protection concerns, should know about the child’s circumstances, as it may affect practical matters such as:

- Who meets the child from school;
- Who gives permission to go on school outings and educational visits;
- Who attends parents’ evenings;
- Who should or should not share a room at the school or on a trip.

Teachers, support assistants, therapy and visiting medical staff may all attend child protection conferences where they are likely to hear detailed information about family circumstances and abusive incidents. They may also receive minutes that record these meetings. Particular care is necessary to maintain the confidentiality of such information whilst ensuring that the issues that may impact upon the child’s life are communicated to all relevant staff.

Staff, unless directly asked and supervised, should never raise with a child, information to which they have had access. The child’s or young person’s feelings should be paramount and many prefer staff not to know about traumatic events in their lives. The importance of discretion in the handling of such information cannot be overstated. Any infringement of this policy, for example by inappropriate discussion in inappropriate settings or the sharing of confidential information for a purpose not sanctioned by the school will be regarded as a serious breach of professional conduct and would lead to disciplinary action against the members of staff concerned.

Communication - Parents

- The school will ensure that parents have an understanding of the responsibility placed on the school and staff for child protection and safeguarding young people.
A child protection statement is included in the school’s Parent Handbook. The school’s Safeguarding and Child Protection Policy is published on the school’s website.
- Parents play an important role in protecting their children from abuse. The school is required to consider the safety of the child and should a concern arise, professional advice will be sought prior to contacting parents.

- If deemed appropriate parents will be contacted, and the school will continue to work with the parents to support the needs of their child. Gaining consent from the parents will be sought, although parental consent is not required before making referrals to statutory agencies.
- The DSL (or in the DSL's absence the DDP) will undertake appropriate discussion with parents prior to involvement of another agent unless the circumstances preclude this. Parents should generally be consulted before a referral is made about them to another agency but there are certain circumstances when this is not the case. Staff must seek guidance if they are unclear as to whether they should discuss a concern with parents.
- The school takes seriously its duties to assist parents and help them with online safeguarding resources. As such, we will make them aware of the web page **Parent Info** which is a comprehensive, free resource for schools and parents covering a range of safeguarding topics and information about apps and when they are updated etc. The content is updated by CEOP (Child Exploitation & Online Protection Centre) and can be found at: <https://www.ceop.police.uk/safety-centre/>
- Parents that may have concerns regarding a member of staff can in the first instance raise those with the Head, Deputy Head, the DSL or Governing Body for further exploration. This may involve sharing those concerns with the relevant agencies. Where the parent may have concerns regarding the Head, the Chairman of Governors should be contacted.
- Parents can liaise with the Independent Schools Inspectorate (ISI) on such conduct issues or regulatory concerns: advice can be found on its website www.isi.net or contact can be made direct to ISI. See Appendix I for contact details. Concerns may be copied to the Department for Education (DfE).
- On occasions ISI may forward complaints that **may** raise a safeguarding concern about our school via Family Connect. In such instances we will work with all agencies within Family Connect to clearly respond to ISI on a case by case basis. We wish to make it clear that there is a separate standalone formal school Complaints Policy and Procedures which can also be used to raise concerns of any nature, please see the school's website for familiarisation of that route. **We would hope that the need to elevate those concerns is a rare occurrence but for transparency we wish to make it clear that that route is available for parents. Parents can also speak to the Head/Governing Body if clarification is needed.**
- If concerns relate to bullying or possible child abuse, then in addition to ISI and/or DfE parents can contact the Safeguarding Team Helpdesk: see Appendix I for contact details.
- If concerns are related to a child protection issue parents can contact ISI: see Appendix I for contact details.
- We will keep parents informed in all areas of safeguarding and child protection through regular methods of interaction such as parents' meetings, newsletters etc.
- We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely from us. In relation to this we understand that on some occasions tensions can run high where safeguarding concerns arise and need to be discussed, but for the safety of all we wish to remind parents that although schools are fulfilling a public function, schools are private places. The school will therefore act to ensure they remain a safe place for pupils, staff and other members of the community. The public has no automatic right of entry. The same principles of safety will apply to social media issues where we will **expect parents to talk to school in the first instance, before taking to social media to express their thoughts.**

Barring from the School Premises

‘Although fulfilling a public function, schools are private places. The public has no automatic right of entry. Schools will therefore act to ensure they remain a safe place for pupils, staff and other members of the community’. DfE Best Practice Advice for School Complaints Procedures - January 2016

However unlikely the scenario is, if a parent’s behaviour is a cause for real concern, the school will ask him/her to leave the school premises. In serious cases, the Head can notify them in writing that their implied licence to be on school premises has been temporarily revoked subject to any representations that the parent may wish to make. The school will give the parent opportunity to formally express their views on the decision to bar in writing.

The decision to bar will then be reviewed, taking into account any representations made by the parent, and either confirmed or lifted. If the decision is confirmed the parent will then be notified in writing, explaining how long the bar will be in place.

Anyone wishing to complain about being barred can do so, by letter or email, to the Head or Chairman of Governors. However, complaints about barring cannot be escalated to the DfE. Once the school’s own complaints procedure has been completed, the only remaining avenue of appeal is through the Courts; independent legal advice must therefore be sought.

The content above has been adopted by this school from Department of Education [advice ‘Best Practice Advice for School Complaints Procedures 2020’](#)

PART 8: ALLEGATIONS AND DISCLOSURES AGAINST STAFF OR VOLUNTEERS AND PUPILS

The process of managing allegations against those who work with children can be viewed on <http://westmidlands.procedures.org.uk/> Section 1.14 'Allegations against Staff or Volunteers'.

Old Hall has internal procedures and processes in place for dealing with allegations and will follow TWSP policy and procedure.

We will adhere to Part Four of KCSIE September 2024 'Allegations of abuse made against teachers and other staff', where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers 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;
- or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This school believes that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adapted by this setting for staff and governors.

[Guidance for safer working practice for those working with children and young people in educational settings](#) produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all those that work with children. We will make all those in the school community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

Staff must protect themselves and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. It is important not to touch pupils, however casually, in ways or on parts of the body that might be considered indecent.

Under the Sexual Offences (amendment) Act 2000, it is an “abuse of a position of trust”, and thus a criminal offence, for a member of staff at a school to engage in sexual activity with a pupil aged under 18. **Any concerns under this heading must be referred to the DSL.**

The school understands that a pupil may make an allegation of abuse against a member of staff.

The school has procedures for dealing with allegations against staff that aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations.

Determination of level of concern

At Old Hall we encourage an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. We hope this should enable the identification of concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that all adults working in or on behalf of the school are clear about professional boundaries

(encouraging them to act within these boundaries and in accordance with the ethos and values of the school).

A: Low level concerns

Old Hall will use the following processes to manage and record any concerns (including allegations) which do not meet the harms threshold (see part B, below), and will take appropriate action to safeguard children.

Concerns may arise in several ways and from a number of sources, for example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken.

The term 'low level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the harm threshold (see below).

A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

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

Examples of such behaviour could include (but are not limited to): being over 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 areas or behind a closed door; or using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless; behaviour that may look to be inappropriate, but might not be in specific circumstances; through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (see below), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

Reporting of low level concerns

Low level concerns about a member of staff, supply staff, volunteer or contractor should be reported as per section 2 'Reporting' below (and as set out in Part one of KCSIE 2024), in the same way as allegations of a more serious nature, allowing the Head and DSL (as long as the concern/allegation is not concerning them) to determine the level of concern being raised and therefore to deal with the concern in the most appropriate manner. Low level concerns should be reported to the DSL, who will inform the Headmaster in a timely fashion of the nature of the low level concern. The Headmaster will be the ultimate decision maker in respect to low level concerns, but he may consult with the DSL depending on the nature of the concern raised.

Reports about supply staff and contractors should be made to the DSL, who will notify their employers, so any potential patterns of inappropriate behaviour can be identified.

If there is any doubt as to whether information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, then the DSL or Headmaster will consult the LADO.

Recording of low level concerns and References

All low-level concerns will be recorded in writing, including details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted; the wish of an individual to remain anonymous will be respected as far as reasonably possible. These records will be kept confidential, retained securely, and will comply with UK GDPR. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school will decide on a course of action, either through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies might be revised or extra training delivered to minimise the risk of it recurring.

The school is likely to retain such information until the individual leaves our employment. However, low level concerns will not be included in references, unless they relate to issues which would normally be included in a reference, for example misconduct or poor performance. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it would be referred to in a reference.

Responding to low level concerns

If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking: directly to the person who raised the concern, unless it has been raised anonymously; to the individual involved and any witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded, along with the rationale for their decisions and action taken.

B: Allegations that may meet the harm threshold

The school will follow guidance in Part Four of KCSIE September 2024 where a concern includes an allegation that might meet the harm threshold.

The school will manage all cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. We will act on allegations if a teacher or member of staff (including volunteers, supply staff and contractors) in our school has:

- a. Behaved in a way that has harmed a child, or may have harmed a child; and/or
- b. Possibly committed a criminal offence against or related to a child; and/or
- c. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- d. Behaved or may have behaved in a way that indicated they may not be suitable to work with children. This final bullet point includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children; this is known as transferable risk.

For example, if a member of staff is involved in domestic violence at home. Even if no children were involved, the school would still need to consider what triggered these actions and whether a child in the school could trigger the same action, therefore be potentially put at

risk. Where appropriate, an assessment of suitable risk to children with whom the person works will be undertaken, with advice sought from the local authority designated officer (LADO) if need be.

Non recent allegations

Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with CSC and the police. Abuse can be reported no matter how long ago it happened.

1. Whistleblowing

- The school recognises that pupils cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

A person who in good faith reports significant concerns, allegations or suspicions of circumstances, situations or the behaviour of others which is likely to put a child's safety or welfare at risk will never be victimised following their disclosure.

2. Reporting

The school has internal procedures and processes in place for dealing with allegations and will follow TWSP policies and procedures.

Allegations or concerns are reported without delay in the following way:

- Safeguarding concerns or allegations against staff, including the DSL, Designated Persons and volunteers** must be reported to the **Head** ('case manager'), who will liaise with the Local Authority Designated Officer (LADO) through Family Connect;
- Safeguarding concerns or allegations against the Head or any adult member of his family** must be reported to the **Chair of Governors** ('case manager'), who will liaise with the Local Authority Designated Officer (LADO) through Family Connect.

The Head and the Chair of Governors ('case manager') must consult with the DSL so long as the allegation is not concerning them.

In the absence of the Head, reports should be made to the DSL, or if the allegation is against the DSL to the Chair of Governors (not another member of the school's safeguarding team).

The above procedure **MUST BE** followed.

Where the school identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the case manager will contact CSC and, as appropriate, the police immediately (as per the processes explained in Part one of KCSIE 2024).

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

- **Looking after the welfare of the child** – the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority's CSC, as described in Part one of KCSIE 2024. If there is cause to suspect a child is suffering, or is likely to suffer, significant harm, a strategy discussion involving the police and/or CSC will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#).

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to CSC.

- **Investigating and supporting the person subject to the allegation** – when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. As an employer, The Old Hall Wrekin College Trust will offer appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and will not ordinarily be shared with other staff or with children or parents not directly involved in the investigation. In addition to the points outlined in the procedure below (point 3), the school: will advise the individual to contact their trade union representative, or a colleague, for support; will provide access to counselling or medical advice where appropriate; will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Whilst the LADO and the police can advise, ultimately the power to suspend is vested in the governing body (who are the employers). This decision will be taken on a case-by-case basis, having undertaken a risk assessment about whether the person poses a risk of harm to children. Suspension is not the default position: an individual will be suspended **only** if there is no reasonable alternative. The case manager will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false. In many cases, an inquiry can be resolved quickly and without the need for suspension.

If immediate suspension is considered necessary, the case manager will record the rationale and justification for such a course of action. This will also include what alternatives to suspension has been considered and why they were rejected. Where it has been deemed appropriate to suspend the person, written confirmation will be given within one working day,

giving as much detail as appropriate for the reasons for the suspension. The person will be informed at the point of suspension who their named contact is within the organisation and provided with their contact details.

If the school were to be made aware that the Secretary of State has made an **interim prohibition order** in respect of an individual who works at Wrekin College, we would take immediate action to ensure the individual does not carry out work in contravention of the order. This means that, pending the findings of the TRA investigation, the individual **must not** carry out teaching work.

ALL allegations MUST be referred to the Local Authority Designated Officer (LADO) for advice BEFORE any investigation takes place.

In the case of serious harm, and/or if a crime has been committed, the Police **MUST** be informed from the outset. The school **MUST NOT** undertake its own investigation of an allegation without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

The school MUST NOT require parental consent before reporting allegations to the LADO.

We will liaise with our HR Department to provide support to staff going through the disciplinary and LADO investigative process. This will support referrers, investigators and those affected in any such dealings.

If a pupil makes an allegation against a member of staff

If a pupil makes an allegation against a member of staff the procedure outlined below must be followed. In addition, note the following:

- No discussion with any other member of staff should take place;
- The child must not be questioned beyond establishing the points she/he wishes to make;
- The Head should be informed as soon as possible after the disclosure has been made;
- The Head will liaise with the LADO.

To avoid potential allegations and for the safety and welfare of pupils and the protection of staff, we have made classrooms highly visible places where easy viewing is possible. Therefore, the masking of windows is not allowed and is treated as a health and safety issue for all. There may be exceptional circumstances where masking of windows is needed and justified, for example for the teaching of drama. In these cases the Headmaster will make a judgement on a case-by-case basis

If an allegation is made against a teacher, the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated.

3. Procedure to be followed when allegations of abuse are made against a member of staff (teaching or non-teaching):

The Head or (where the Head or an adult member of their family is the subject of the allegation, the Chair of Governors) (hereafter referred to as the ‘case manager’) will:

1. Discuss the allegation immediately with the LADO by contacting Family Connect.
2. The purpose of the initial discussion is for the LADO and case manager to consider the nature, content and context of the allegation and agree on a course of action.
3. The case manager will provide or obtain relevant information as requested by the LADO. In some situations, the case manager may consider it appropriate to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the LADO in order to help determine whether police involvement is necessary.
4. The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by the case manager. The case manager will reach an agreement with the LADO on what information should be put in writing to the individual concerned and by whom. The case manager will then consider, with the LADO, what action should follow both in respect of the individual and those who made the initial allegation.
5. The case manager will inform the accused person about the allegation as soon as possible after consulting the LADO. The case manager will provide them with as much information as possible at that time. However, where a strategy discussion is needed, or police or CSC services need to be involved, the case manager will not do this until those agencies have been consulted, and have agreed what information can be disclosed to the accused. We will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. We will explore all options to avoid suspension prior to taking that step. Suggestions as to potential alternatives to suspension for staff under investigation are outlined in [Part four of KCSIE 2024](#).
6. The school will consider options where an investigation by the police or CSC services is unnecessary, or the strategy discussion or initial evaluation decides that is the case. The case manager will discuss the next steps with the LADO. In those circumstances, the options open to us depend on the nature and circumstances of the allegation and the evidence and information available.
7. This will range from taking no further action to dismissal or a decision not to use the person's services in future.
8. Where further enquiries are needed to enable a decision about how to proceed, the case

manager will discuss with the LADO how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by a senior member of the school's staff.

9. Where the nature or complexity of the allegation requires it, the allegation may require an independent investigator.

10. The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. The school will offer appropriate support from other services.

11. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

12. The school will inform parents or carers of the child or children involved about the allegation as soon as possible, if they do not already know of it. However, where a strategy discussion is required, or police or CSC services need to be involved, the case manager
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will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case, only in relation to their child – no information can be shared regarding the staff member.

13. Parents or carers will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress, as set out in section 141F of the Education Act 2002 (see section 4 'Confidentiality and Information Sharing' below).

14. In cases where a child may have suffered significant harm, or there may be a criminal prosecution, we will work with CSC services, or the police as appropriate, to consider what support the child or children involved may need.

The school will also act to manage and minimise the stress inherent in the allegations process.

Supply Teachers

In some circumstances the school may have to consider an allegation against an individual not directly employed by the school, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (hereafter together referred to as 'agency').

Whilst the school is not the employer of supply teachers, we will ensure that allegations are dealt with properly. In no circumstances will the school decide to cease to use a supply teacher owing to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. The Governing Body should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or

children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the Governing Body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, the school should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Governors

If an allegation is made against a governor, the school will follow similar procedures to those used to investigate a member of staff. Where an allegation is substantiated, the school would follow procedures to consider removing them from office.

4. Confidentiality and Information Sharing

In an allegations management meeting, or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of an allegation, and about the alleged victim (see Part 3 of this policy regarding referrals, working together and information sharing, based on the guidance in Part two of KCSIE 2024).

Where the police are involved, wherever possible the school will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as the investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.

CSC should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to us, the employer, without delay.

The school will make **every** effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions make it an offence (except in the limited circumstance expressly permitted by the legislation) for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

- The point that the accused person is charged with a relevant offence; or
- The Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the “publication” (any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public) of material by any person that may lead to the identification of the teacher who is the subject of the allegation.

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police wish to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted.

The case manager will take advice from the LADO, police and CSC services to agree the following:

- Who needs to know and exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it should arise

5. Allegation outcomes

The following definitions should be used when determining the outcome of an allegation:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to prove or disprove the allegation. The term therefore does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Reporting to the Disclosure and Barring Service and Teacher Regulation Agency

If the allegation is **substantiated** and:

- The person is dismissed, resigns or otherwise ceases to provide his or her services; or
- The employer ceases to use the person’s services; the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged

in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. The DBS address and contact details for referrals are listed in Appendix I.

<https://www.gov.uk/government/publications/dbs-workforce-guidance>

A. Reporting to the Teaching Regulation Agency

Employers have a statutory duty to consider referral of cases involving serious professional misconduct to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) to consider prohibiting the individual from teaching. [The reasons for such an order are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute”, or a “conviction, at any time, for a relevant offence”.]

B. Police and criminal investigation or prosecution

The school will make prompt contact with the police if a criminal offence is suspected.

The police should inform the LADO and the employer immediately when:

- A criminal investigation and any subsequent trial is complete;
- It is decided to close an investigation without charge; or,
- It is decided not to continue to prosecute after the person has been charged.

In the above circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children’s social case should also inform that decision. The options will depend upon the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation or report is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to CSC may be appropriate.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it, as per our behaviour policy and staff code of conduct.

Return to work

Where it is decided on the conclusion of a case that a person who has been suspended should return to work, the case manager should consider how best to facilitate that. Guidance and advice will be sought via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual’s circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may also be appropriate. The case manager should also consider how the person’s contact with the child or children who made the allegation can best be managed if they are still attending the school.

Resignations and ‘settlement agreements’

Wrekin will not cease investigations if the person leaves, resigns or ceases to provide their services, nor will we reach a settlement/compromise agreement with that person until investigations into any allegations are concluded (as set out above).

For further information on resignations, ‘settlement agreements’, record keeping and references see Part Four of KCSIE September 2024 (paragraphs 416-426).

Learning lessons

Throughout the process in handling allegations and at the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school’s procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not the suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and the case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

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

6. Allegations Made Against Pupils

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school’s policy on behaviour and discipline will apply.

Procedure to be followed:

- The DSL/Deputy Head should be informed immediately, who will liaise with the Safeguarding Team.
- An investigation will be carried out, which will be led by a designated person in conjunction with the pupils’ Class Teacher.
- The immediate safety of the victim will be considered and a safe place provided (Health and Wellbeing Centre).
- Both sets of parents will be informed.
- Support will be offered to BOTH individuals.
- Following investigation, an appropriate way forward will be decided in line with the school’s behaviour policy.

Abuse by pupils in the school may be physical, sexual or emotional.

There will be a need to distinguish between actions that can be dealt with through normal disciplinary channels and those that constitute potential abuse where involvement of other statutory agencies is required.

Child-on-child abuse can manifest itself in many ways. See Part 10 of this document. Abuse and Pupils with Special Educational Needs or Disabilities - see Appendix 4.

PART 9: ACTING ON CONCERNS REGARDING AN ADULT'S BEHAVIOUR (NOT AN EMPLOYEE OR VOLUNTEER WORKING FOR THE SCHOOL)

If you have any concerns about an adult's behaviour towards children or young people (not an employee or volunteer working for the school):

- Do not ignore it – the school and TWSP will take any concerns very seriously;
- You must discuss your concerns with the DSL, who will support you in liaising with the statutory agencies should any child protection matter arise;
- Do not confront the adult but seek the advice of the DSL/Deputy Head. If the DSL or other designated person are not available, contact the Safeguarding Team or Telford & Wrekin SCB. The numbers can be found in Appendix I.

Acting on a disclosure from an adult that they are involved in the abuse of a child or young person

If someone not employed by the school discloses that they are involved in the abuse of a child or young person, you must take action:

- Believe what they are saying and take the allegation seriously;
- Record details of what you have been told as soon as possible;
- Report it to the DSL, who will ensure the appropriate actions are taken, also explaining the limits of confidentiality;
- If for any reason you cannot contact the DSL immediately or another designated person, then you must directly contact either Children's Social Care (CSC) or the Police. Your actions must be communicated to the DSL as soon as possible. The numbers can be found in Appendix I.

PART 10: CHILDREN'S WELFARE – SPECIFIC CONCERNS

All staff will be made aware of safeguarding issues children may face. All staff will be trained in how to escalate any of the concerns appropriately.

For avoidance of doubt Annex A of KCSIE 2024 will be referred to for any assistance that the DSL or any other school staff may need in ensuring a child's safety and welfare.

Early help

We believe that any child may benefit from early help, and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs; has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines; is frequently missing/goes missing from education, care or from home; has experienced multiple suspensions, is at risk of being permanently excluded school or college and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the day.

Young carers

Legislation defines a 'young carer' as '...a person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work). A young carer might look after someone because they are sick or have a disability or mental health issues. Or, if a parent or family member has an alcohol or drug problems, they may be unable to care for themselves or anyone else.

We recognise the responsibilities of young carers are wide and varied but can include:

- practical tasks, such as cooking, housework and shopping;
- physical care, like helping someone out of bed;
- emotional support, including talking to someone who is distressed;
- personal care, such as helping someone dress;
- managing the family budget and collecting prescriptions;

- helping to give medicine;
- helping someone communicate, and
- looking after brothers and sisters.

Caring for someone can be very isolating, worrying and stressful for children. For young carers, this can negatively affect their experience in education. We recognise that many young carers will regularly miss school/college and that this can have a lasting effect on their life chances.

Our aim is to work with families and other agencies to identify young carers to ensure that their needs are assessed and where necessary supported. We will work with the Telford and Wrekin Young Carers Service to do this.

For further information see Appendix 5

I. Attendance and Children who are absent from education for prolonged periods and/ or repeated occasions

Children Missing in Education has now been updated to: Children who are absent from education for prolonged periods and/ or repeated occasions

Children Missing Education (CAE) are children and young people of compulsory school age who are not registered pupils at a school and not receiving suitable education otherwise than at a school. 12 Jun 2023

clarification that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. 1 Sept 2023

<https://www.gov.uk/government/publications/children-missing-education>

https://www.telford.gov.uk/downloads/file/798/children_missing_education_CA_protocol

- “School staff need to be particularly sensitive to signs which may indicate possible safeguarding concerns. This could include for example, **poor or irregular attendance or children missing from education**” (Ofsted September 2009). When attendance falls to 93% an attendance alert is raised, if attendance falls to being less than 90% (the recognised figure for persistence absence) then the Designated Safeguarding Lead will seek advice and may contact the local Education Welfare Officer, although concerns may still be raised if above this.
- In respect of this, the school will refer to and use its Missing Child Policy, in tandem with the established protocol document of notification to the Local Authority, completing the appropriate paperwork, “Policy and Procedures for Identifying Children Not Receiving Education (CNRE) and Children Missing Education (CAE)” Telford & Wrekin Council – September 2019.
- As part of induction staff will be made aware of the school’s unauthorised absence and children missing from education procedures.
- Children Absent from Education (CAE):
These 'absent' children can be vulnerable; it is essential that all services work together to identify and re-engage these children back into appropriate education provision as quickly as possible. It is important to establish the reasons for the child being missing at the earliest possible stage.

- Possible reasons that should be considered include:
 - Failure to start appropriate provision and never enter the system;
 - Stopped attending, due to illegal exclusion or withdrawal by parent/carers;
 - Failure to complete a transition between schools;
 - Children from refugee and asylum seeking families;
 - Children from families who are highly mobile;
 - Children at risk of a forced marriage;
 - Children experiencing abuse and neglect.
 - Children experiencing Child Sexual Exploitation and Child Criminal Exploitation, including involvement in County Lines
- In addition to the above and where reasonably possible we will endeavour to hold **more than one emergency contact number for each pupil**. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child is missing education and poses a potential welfare/safeguarding concern.

2. Child-on-child Abuse

- At Old Hall all staff are trained to understand that children can abuse other children we refer to this as child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:
 - bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence, such as rape, assault by penetration and sexual assault;
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
 - upskirting, which 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;
 - sexting (also known as youth produced sexual imagery), and
 - initiation/hazing type violence and rituals.
- The school actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:
 - educating all governors, its senior leadership team, staff, students, and parents about this issue;
 - educating children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum;
 - engaging parents on these issues;
 - supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs;
 - working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community;
 - creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture;
 - responding to cases of child-on-child abuse promptly and appropriately, and
 - ensuring that all child-on-child abuse issues are fed back to the DSL and deputies so that they can spot and address any concerning trends and identify students who may be in need of additional support.

- The school actively engages with TWSP in relation to child-on-child abuse, and works closely with, for example, children's social care, the police and other schools. The relationships the school has built with these partners are essential to ensuring that the school is able to prevent, identify early, and appropriately handle cases of child-on-child abuse. The DSL (or deputy) will regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.
- The school recognises that any child can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. We know that research suggests:
 - child-on-child abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously;
 - children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and
 - some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

The response to child-on-child abuse, including reports of sexual violence or sexual harassment

- We will undertake pre-planning, training for staff and implement an effective child-on-child abuse policy to help us develop the foundation for a calm, considered and appropriate response to any reports.
- The school will always reassure victims that they are being taken seriously and that they will be supported and kept safe. We will never give a victim the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report.
- If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL (or deputy) without delay.
- The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.
- All staff, especially the DSL will give immediate consideration as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). If any of the children involved has SEND the DSL will liaise with the SENCO to assist in the management of the report.
- Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL will consider what urgent action can be taken, this may include seeking specialist help, such as advice from [The Internet Watch Foundation](#) and the police in preventing the images spreading further and removing the images from the internet.
- The DSL will use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.
- In borderline cases the DSL may consult with Family Connect, and/or other relevant agencies on a no-names basis (where possible) to determine the most appropriate response.
- Where the DSL (or deputy) considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL will contact Family Connect or the local social care team for the child and/or the police immediately and, in any event, within 24 hours of the DSL (or deputy)

becoming aware of the alleged behaviour. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

1. manage internally;
 2. early help;
 3. referral to children's social care; and
 4. reporting to the police.
- The School/college will always carry out a written safety plan/risk assessment in respect of:
 - any child who is alleged to have behaved in a way that is considered to be abusive or violent;
 - any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
 - any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.
 - It may be appropriate to contact children's social care and/or police to assist in carrying out a safety plan. The DSL may use and consider the [TWSP Sexually harmful behaviour - risk assessment tool](#). Where other children have been identified as witnesses to alleged abuse or violence, consideration will also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.
 - When responding to concern(s) or allegation(s) of child-on-child abuse, the school will:
 - always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals;
 - record the information that is necessary for the school and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved;
 - keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
 - be mindful of and act in accordance with its safeguarding and data protection duties.
 - The school will use the following guidance to assist in the managing of reports [Sexual violence and sexual harassment between children in schools and colleges: advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads](#).
 - Where necessary for effective safeguarding we will utilise/seek resources and seek support from established sources. We will consider and in some cases access the [Child-on-child abuse toolkit](#) to assist in our decision making and will also consider the Brook traffic light tool.
 - In relation to sexting, also known as youth produced sexual imagery, the school will where necessary consult with guidance produced by [The UK Council for Child Internet Safety \(UKCCIS\) Education Group Sexting in Schools and Colleges](#) and DfE guidance [Searching, screening and confiscation](#). The DSL (or deputy) will take the lead on these issues.

See the school's separate Child-on-child Abuse Policy

3. So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

- Where issues may be raised of **Forced Marriage, Honour Based Violence (HBA) or Female Genital Mutilation (FGM)** whether by people within the school community, the wider community, older or younger children we will follow Government guidance 'Handling cases of Forced Marriage' (multi

agency practice guidelines) June 2009, 'Female Genital Mutilation' (multi agency practice guidelines) HM Government 2016, pages 24 – 26 and Home Office 'Mandatory reporting of female genital mutilation: procedural information' October 2015. We will consult appropriately and sensitively, in a two-way process, in line with that national guidance, current, future and local procedure. The school recognises that FGM is against the law and we will alert staff to free on line training at:

- <https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack>
- In respect of FGM, the school will adopt the local TWSP "[FGM Practice Guidelines and Resource Pack](#)" as part of safeguarding responsibilities and inform/educate our staff in this particular area.

Female Genital Mutilation (FGM) – see the NSPCC website <http://goo.gl/12uFxr> or the helpline [0800 028 3550](tel:08000283550).

FGM concerns must be reported to the local police (mandatory from October 2015) – see Appendix I for contact details.

4. Serious Violence

- All staff are aware of 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 a significant change in wellbeing, or signs of assault or unexplained injuries. 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. Staff will be aware of the associated risks and understand the measures in place to manage these.
- We will follow the advice provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. **See Appendix 5.**

5. Mental Health

- All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will be made aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child or a parent that is also a safeguarding concern, immediate action should be taken, by speaking to the DSL or a deputy and recording their concern.
- We will follow the DfE and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#).

Please refer to our Mental Health & Well-being policy.

6. Children Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- Old Hall recognises both CSE and CCE are forms of abuse.

- They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.
- CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.
- Some of the following can be indicators of CCE:
 - children who appear with unexplained gifts or new possessions;
 - children who associate with other young people involved in exploitation;
 - children who suffer from changes in emotional well-being;
 - children who misuse drugs and alcohol;
 - children who go missing for periods of time or regularly come home late, and
 - children who regularly miss school or education or do not take part in education.
- The above CCE indicators can also be indicators of CSE, as can:
 - children who have older boyfriends or girlfriends, and
 - children who suffer from sexually transmitted infections or become pregnant.
- We will follow the DfE [Child sexual exploitation: guide for practitioners](#).
- If we feel that children may be being abused through exploitation we will consult in the normal way with the relevant local authority social care team to seek advice. In Telford & Wrekin we will consider whether the incident follows a [CSE Care Support Pathway](#). The concerns will be followed through sensitively and appropriately with fellow professionals and the [CATE Referral Form](#) will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around a child attending our school/college, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this we have taken the same steps and made all staff aware of the TWSP [CSE Warning Signs Checklist](#).

7. Potential victims of Modern Slavery and Child Human Trafficking

- Modern slavery, including child trafficking, is child abuse.
- If, as a school, we become aware or have suspicions that a child may have or is being exploited or trafficked, we will contact Family Connect in the normal manner to seek advice and support.
- All children, irrespective of their immigration status, are entitled to safeguarding and protection under the law.
- This school recognises this as any normal child protection referral and potential victims of trafficking and modern slavery can be of any nationality and may include British children. This may cover not only those trafficked for sexual exploitation but those trafficked as drug carriers internally in the UK.

We know that information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#).

8. Children Leaving School Without Permission

- Where **children leave the classroom or leave the school grounds without permission**, this is covered within our missing child policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5) where it is 'reasonable in all circumstances to safeguard and promote the child's welfare'. However, in principle, if a pupil runs out of class we will establish where he or she has gone and send a message to the Head's Office for adult support.
- **Where children have gone missing** and not in the manner of the above we will follow the school's Missing Child Policy.

9. Private Fostering, Homelessness and Homestay Arrangements

- A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or under the age of 18 if the child is disabled, this extends to children who are within homestay arrangements. Children who are looked after by the local authority or who are placed in a residential school, Children's home or hospital are not considered to be privately fostered.
- Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases where so called 'sofa surfing' has been evident. It is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.
- This school also recognises that children whether through family difficulties or through their own choice could be at risk of **becoming homeless**. This school recognises that we will refer and consult with relevant agencies to support any families/child or children in this situation.
- By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, the school will encourage parents and private foster carers to notify Children's Social Care and will share information to Children's Social Care as appropriate.
- In the case of Homestay arrangements we will ensure that our school falls within the duties as set out in Annex D (page 170) of KCSIE 2024, 'Host families-homestay during exchange visits'. For avoidance of doubt these include any arrangements at home or abroad.

11. Drug and Substance Misuse

Where issues come to the attention of the school in relation to drugs and substance misuse we will follow the school's Controlled Drugs and Substance Misuse Policy which follows the non-statutory advice contained within '**DfE and ACPO drug advice for schools**' **September 2012**. This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within school. The document produced by the Department of Education and the Association of Chief Police Officers clearly sets out the role of schools, their powers and what schools can do. Coupled with this preventative and supportive approach this will sit hand in hand with our statutory functions of child protection and the alerting to established referral procedures and the law of the land.

12. Domestic Violence and Abuse

- Domestic abuse, be it physical, sexual, financial, psychological or emotional, can include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity,

socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

- Research increasingly indicates that Domestic Violence and Abuse in any form can and does have an impact on children and young people of all ages and backgrounds. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- Young people can also experience domestic abuse within their own intimate relationships, as victims and perpetrators. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child-safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.
- For the avoidance of doubt, and in regard for children's welfare, this school will liaise with agencies in a two-way process where Domestic Violence/Serious Harm is a factor in the household. Children within our care will be supported where needed and the school will be available for them. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence MARAC (Multi Agency Risk Assessment Conferences), MAPPA (Multi Agency Public Protection Arrangements) or any other named agencies where these specific issues are a factor that may impair and impact on a child's development. The school is also part of the TWSP early warning scheme 'Operation Encompass' which is regularly checked for incidents involving the police and our pupils' families.
- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.
- We will use the following additional advice on identifying children who are affected by domestic abuse and how they can be helped:
 - [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
 - [SafeLives: young people and domestic abuse](#)

13. Suicide Intervention

- This school accepts and understands that thoughts of attempting suicide are increasingly common and the leading cause of death in young people, with suicidal thoughts also occasionally occurring in children of primary school age. As such suicide intervention is our business too. This school wants to work with our pupils and work in partnership to support anyone in our school community that may have thoughts of suicide. We will also make staff aware of the following useful link in raising awareness of the subject: <http://zerosuicidealliance.com/>
- This school recognises that **suicide bereavement has been described as 'grief with the volume turned up'**. The effects on families, communities and society as a whole are devastating and tragic.
- This school will support in any way we can and the link below will be signposted as appropriate: <http://www.petesdragons.org.uk/>

14. Children with Family Members in Prison and within the Court System

This school will be aware that some children may have family members in prison and within the court system and also may be subject to the court system themselves when parents are in the process of separating. We

recognise that they may need extra support during this traumatic time in their lives. We will provide whatever support is needed and in respect of the child's wishes, work with the family to support them. We will only do this with consent of the parents and wider family and any agency asking for us as a school community to support. Where necessary we may seek specialist help and direct those needing it to the website; <https://www.nicco.org.uk/>. In relation to children in the court system we recognise that assistance is hyperlinked and available within Annex B of KCSIE 2024 to support staff.

15. Sexual Violence and Sexual Harassment between Children in Schools

This school accepts that sexual violence and sexual harassment can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

When referring to sexual harassment school/college mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- **Sexual comments**, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- **Sexual 'jokes' or taunting**;
- **Physical behaviour, such as**: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- **Online sexual harassment**. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Non-consensual sharing of sexual images and videos;
 - Sexualised online bullying;
 - Unwanted sexual comments and messages, including, on social media;
 - Sexual exploitation; coercion and threats; and
 - Upskirting.

Upskirting

This school understands that '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. This is a criminal offence.

This school will treat sexual violence and sexual harassment in line with any other child protection concern and refer onto relevant agencies as stated within our policy, as such this school will adopt the DfE document: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

If there is a report of sexual violence, the DSL (or a member of the safeguarding team) will make an immediate risk and needs assessment. If there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. If necessary the school's 'Sexually Harmful Behaviour Risk Assessment' will be used.

Staff should be conversant with the school's Anti-Bullying and Child-on-child Abuse Policies.

See Appendix 5 for further information on this.

16. Fabricated and Induced Illness

“The fabrication or induction of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness: it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child’s signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information”. **Taken from ‘Safeguarding Children in whom illness is fabricated or induced’ HM Government.** This supplementary guidance to **‘Working Together to Safeguard Children’** will be adopted by this school and we will adhere to our duties set out in **‘Working Together’**. At Old Hall, we will also follow the guidance set out by the TWSP Best Guidance.

17. 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.

Children can be targeted and recruited into county lines in a number of locations including our setting, other education settings, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters; and
- have their bank accounts used to facilitate drug dealing.

We will make the [Home Office](#) guidance on the signs of a child's involvement in county lines available to staff.

18. Extremism, Radicalisation, the PREVENT Agenda and Channel

This prevent and radicalisation section remains under review following the publication of a new definition of extremism on 14th March 2024.

- **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** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

Extremist views by anyone in school will not be tolerated. Therefore, we will take and expect quick and decisive action where issues of this nature are brought to our attention and we as a school will follow the [PREVENT duty departmental advice for schools and childcare providers June 2015](#). We also refer to the latest(2023) prevent guidelines:

https://www.gov.uk/government/publications/prevent-duty-guidance?utm_medium=email&utm_source=govdelivery

Especially paragraphs 141-210

Namely, that we expect staff to encourage pupils to respect **fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs**. Staff should ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of pupils; reasonably practicable steps have been taken to offer a balanced presentation of opposing views.

We will treat extremism and radicalisation like any other child protection referral.

- As a school we have procedures in place to **monitor ICT usage (Senso)** and have a duty to seek advice and explore by filtering suspicious content being viewed. Those within and outside the school community should be left in no doubt of our duty to cooperate under the law.
- We will ensure that every frontline member of staff in school has received appropriate PREVENT training.
- The PREVENT Duty is seen by this school as part of its wider safeguarding obligations. Our DSL and any other senior leaders will familiarise themselves with the following updated guidelines from 2023 for England and Wales:
- https://www.gov.uk/government/publications/prevent-duty-guidance?utm_medium=email&utm_source=govdelivery
- The four general themes being: risk assessment, working in partnership, staff training and IT policies.
- As a school if we feel a child is being abused through extremism or being radicalised, we will consult directly with Family Connect and the police PREVENT Team and seek advice. This is done with a <https://www.gov.uk/guidance/making-a-referral-to-prevent>.
- https://www.telford.gov.uk/downloads/file/17302/referral_form

For avoidance of doubt any PREVENT referral will be sent to **Family Connect and the Police**. As with all referrals this referral will be dealt with appropriately with professionals. If it is deemed from the PREVENT Team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently those being **Jas Bedesha**. The education lead for Telford and Wrekin council is Joanne Hanslip. Our policy also recognises that the local police can be contacted (CTU Officer - Alison Potts, a.potts@west-midlands.pnn.police.uk or Holly Aungiers holly.aungiers@westmercia.police.uk in imminent circumstances on **01386 591835/591825** or **591816** and at prevent@warwickshireandwestmercia.pnn.police.uk

Channel

- This school recognises Channel as a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant [Channel guidance](#). if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so.

Appendix I



Contact Details

Designated Safeguarding Lead & Deputy Head: Mr Nick Rothwell – Tel: 01952 223117

Deputy Designated Person/Person responsible for Early Years: Mrs Alison Hartland-Griffiths - Tel: 01952 223117

Deputy Designated Person: Mrs Aimee Williams - Tel: 01952 223117

Cross Trust Safeguarding Adviser Mrs Jill Spence - Tel 01952 223117

Head: Mrs Anna Karacan - Tel: 01952 223117

The Nominated Governor for Child Protection and Safeguarding: Rev Matt Beer, contactable through school: 01952 223117.

Chairman of Governors: Mr Richard Pearson. Contactable through school: 01952 223117.

Social Care Safeguarding Team (LSCB) Helpdesk via The Family Connect Team:

- Tel: 01952 385385
- Opening hours Monday to Friday between 9am to 5pm (excluding bank holidays)
- After 5pm and on weekends contact the Emergency Duty Team on 01952 676500

Safeguarding Advisory Service

30 West Road, Wellington, Telford, TFI 2BB. Tel: 01952 385678

Mr Glenn Ashbrooke: LADO. Derby House (3rd Floor), Wing A, Lawn Central, Telford, TFI 2BB.
Tel: 01952 385385 or **0345 678 9021** Email: glenn.ashbrooke@telford.gov.org

This is the number used for allegations against staff or volunteers working at the school

Mr Scott Thomas-White: Education Safeguarding Children Co-ordinator, Telford & Wrekin Council, Access and Inclusion, School Performance and Development. Tel: 01952 380989 Email: scott.thomaswhite@telford.gov.uk

Attendance Support Team - Pupil Tracking Officer: Tel: 01952 385220
attendance support team [@telford.gov.uk](mailto:attendance.support@telford.gov.uk)

Police - Tel: 0300 333 3000

Latest Prevent information (2023)

https://www.gov.uk/government/publications/prevent-duty-guidance?utm_medium=email&utm_source=govdelivery

Channel Police referral (for radicalisation/extremism concerns) contact the Warwickshire and West Mercia Prevent Team: prevent@warwickshireandwestmercia.pnn.police.uk or contact the local police on 01386 591835/ 591825

The DfE dedicated non-emergency helpline for support and advice about extremism: 020 7340 7264 (or online at counter-extremism@education.gsi.gov.uk)

Independent Schools Inspectorate: First Floor, CAP House, 9-12 Long Lane, London EC1A 9HA.

Tel: 020 7600 0100. **Email:** info@isi.net

If concerns are related to a Child Protection issue: Tel: 020 76000100 or

Email: concerns@isi.net (Independent Schools Inspectorate) who will advise.

The DBS Barring: PO Box 3963, DLI 9FA.Royal Wootton Bassett, SN4 4HH **Tel:** 03000 200190

The DBS Helpline is: 01325 953795

NSPCC Whistleblowing Helpline – Tel: 0800 028 0285

The website for the Children's Commission:



www.childrenscommissioner.gov.uk

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Appendix 2

Key Documentation and Guidance

- Working Together To Safeguard Children (HM July 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf
- Keeping Children Safe In Education (DfE) September 2024
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Safeguarding Children and Safer Recruitment in Education. 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings' produced by the Safer Recruitment Consortium October 2015
<https://www.saferrecruitmentconsortium.org/>
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism - HM Government 2023
- https://assets.publishing.service.gov.uk/media/651e71d9e4e658001459d997/14.320_HO_Channel_Duty_Guidance_v3_Final_Web.pdf
- Child sexual exploitation (DfE February 2017)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf
- Information Commissioner's Office:
https://ico.org.uk/media/fororganisations/documents/1136/taking_photos.pdf
- Information sharing DfE July 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf
- [What to do if you're worried a child is being abused – advice for practitioners \(HM Government March 2015\)](#)
- [The Children Acts 1989 and 2004](#)
- [The Common Assessment Framework \(CAF\) for Children and Young People: Practitioners' Guide \(2006\)](#)

Useful Websites:

www.telfordsafeguardingboard.org.uk

<https://www.isi.net/>

<https://www.gov.uk/government/publications/every-child-matters>

<https://www.nspcc.org.uk/>

https://www.gov.uk/government/publications/prevent-duty-guidance?utm_medium=email&utm_source=govdelivery

Appendix 3

Role Description for the Nominated Child Protection and Safeguarding Governor

The governor responsible for child protection and safeguarding children, will play an essential role in ensuring children in this school are kept safe from harm. The child protection and safeguarding governor plays an important role in ensuring oversight and scrutiny of the child protection and safeguarding policy, procedure and practice on behalf of the full governing body. It is recognised that governors are volunteers and generously give of their time, interest and expertise to the ultimate benefit of children in our schools but it should not be underestimated that their role is that of a 'senior manager' of a school with accountability befitting such a significant responsibility.

The Role of the Nominated Governor for Child Protection and Safeguarding

1. Act as a 'critical friend' to the school, in order to ensure that the appropriate systems and procedures are in place to cover all aspects of the safeguarding agenda and all statutory governing body responsibilities are met.
2. Monitor appropriate policies, including the safeguarding and whistleblowing policies.
3. Ensure there is a suitably qualified, trained and supported Designated Safeguarding Lead (DSL) who has responsibility for responding to and overseeing safeguarding issues.
4. Ensure there is a suitably qualified, trained and supported Deputy Designated Person (DDP) who has responsibility for responding to and overseeing issues as agreed reasonably to be delegated by the DSL.
5. Ensure that the DSL adequately supervises and supports the work, development and wellbeing of the DDP and any other individual to whom they may delegate additional safeguarding responsibilities in order that there exist clear lines of accountability.
6. Ensure there is a robust system for recording, storing and reviewing child welfare concerns.
7. Liaise with the Head about general child protection and broader safeguarding issues within the school and as such be able to provide reports to the governing body in respect of themes and issues within the school/locality to enable adequate oversight, understanding and development of solutions.
8. Ensure that school staff training is up to date.
9. Attend Raising Awareness Safeguarding and Child Protection Training every 2 years and other training as appropriate to the role and relevant to issues within the school/locality
10. Attend Basic Awareness Safeguarding training every 2 years and other training as appropriate to the role and relevant to issues within the school/locality
11. Ensure other governors attend appropriate child protection and safeguarding training.
12. Ensure appropriate members of the governing body complete training in respect of allegations against staff.
13. Ensure that any governor on the recruitment and selection panel for a Head has successfully completed accredited safer recruitment training.
14. Ensure that all members of the SLT on the recruitment and selection panel for staff has successfully completed accredited safer recruitment training.
15. Ensure interview panels are convened appropriately and safer recruitment practices are followed.
16. Have oversight of the single central record and ensure it is up to date and maintained in line with guidance.
17. Take account of how safe pupils feel when in school.
18. Ensure the voice of pupils is truly heard and appropriately acknowledged.
19. Ensure the school constantly reviews and considers their curriculum in order that key safeguarding 'messages and lessons' run throughout.
20. Ensure the school does not operate in isolation and has an awareness of agencies available to support children and families.

21. Ensure the child protection and safeguarding agenda is embedded in the ethos of the school.
22. Monitor progress against any outstanding actions on the governing body child protection and safeguarding audit tool and other local authority review.
23. Provide an annual report to the full governing body to include, amongst other relevant items, detail pertaining to training, themes, issues, number of CAF assessments led by school (including the number escalated to Child in Need/Child protection, de-escalated), contribution to multi-agency meetings and good practice.

It should be noted that this is a suggested outline only and not an exhaustive list of 'duties'.

Types of Child Abuse, Neglect and Exploitation

‘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. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.’ KCSIE September 2024

The needs and rights of children fall into the following main categories:

- The need for physical care and protection from preventable harm;
- The opportunity for physical and mental growth;
- The need for love and security and the opportunity to relate positively to others;
- The need for new experiences and help in relating to their environment by the way of organising and mastering age appropriate levels of responsibility;
- The need for intellectual development.

A parent/carers must be able to meet these needs or help their child by ensuring they are otherwise met.

A child may be considered to be abused, or at risk of abuse, by its parents/carers when those basic needs are not being met. Careful professional and legal assessment are essential in determining when a child’s needs are not being met to such an extent that it constitutes abuse.

Child abuse includes abuse of a pupil by a member of staff or other adult, abuse at home, which a pupil reports to staff (or another pupil), abuse by a stranger outside school and abuse of one pupil by another pupil.

I. Types of Abuse

Child abuse can take many forms but they are usually divided into four categories:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Physical Abuse

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

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (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

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. 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. The sexual abuse of children by other children is a specific safeguarding issue in education (see child-on-child abuse) and all staff are aware of the settings policy and procedures of dealing with this.

Neglect

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

2. Recognition of Child Abuse and Neglect – Signs and Symptoms

The following is a list of signs and symptoms that may be consistent with abuse; some children can exhibit one or more of these signs for other reasons. If there are concerns about a child displaying any of these indicators the concern should be shared with the DSL (AG) or other Designated Persons (AHG or AW) in the school.

Physical Abuse

Physical Indicators

Unexpected bruises/welts/lacerations/abrasions – especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising

are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of the injury or when it appears frequently.

Unexpected bruises etc:

- On face, lips, mouth
- On torso, back, buttocks, thighs
- In various stages of healing
- Twin bruises on either side of the mouth or cheeks – can be caused by pinching or grabbing
- Bruising on either side of the ear – this is often caused by grabbing a child who is attempting to run away
- Slap marks – these may be visible on the cheeks or buttocks
- Grip marks on arms or trunk
- Clustering forming regular patterns
- Reflecting shape of article used, e.g. belt, buckle, electrical flex
- On several different surface areas
- Regularly appear after absence, weekend or holiday
- Bite marks or fingernail marks
- Black eyes – are most commonly caused by an object such as a fist coming into contact with the eye socket (NB. A heavy bang to the nose may cause bruising to spread around the eyes but a doctor will be able to tell if this has occurred)

Unexplained burns:

- Cigar or cigarette burns especially on soles, buttocks, palms or back
- 'Immersion' burns, where hands, feet or body have been forcibly immersed in very hot water
- Patterns like electrical burner, iron etc
- Rope burns on arms, legs, neck or torso

Unexplained fractures:

- To skull, nose, facial structure
- In various stages of healing

Behavioural Indicators

- Flinching when approached or touched
- Reluctance to change clothes for PE lessons
- Wary of adult contacts
- Difficult to comfort
- Apprehension when other children cry
- Crying/ irritability
- Frightened of parents
- Afraid to go home
- Rebelliousness in adolescence
- Reported injury caused by parents
- Behavioural extremes - aggressiveness, withdrawal, impulsiveness
- Regression or child-like behaviour
- Apathy
- Depression
- Poor peer relationships
- Panic in response to pain

Neglect

Physical Indicators

- Consistent hunger
- Underweight
- Persistent stomach-aches, feeling unwell
- Poor hygiene
- Inappropriate dress
- Consistent lack of supervision, especially in dangerous activities for long periods
- Unattended physical problems or medical needs
- Abandonment

Behavioural Indicators

- Begging
- Stealing food
- Constant fatigue, listlessness
- Poor relationships with care-giver
- Frequent delays in picking child up from playground

Sexual Abuse

Physical Indicators

- Difficulty in walking, sitting down
- Stained or bloody underclothing
- Pain or itching in genital area
- Bruising, bleeding, injury to external genitalia, vaginal and/or anal areas
- Vaginal discharge
- Bed-wetting
- Excessive crying
- Sickness
- Pregnancy, urinary tract infections (UTI), sexually transmitted disease (STD) are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified

Behavioural Indicators

- Inappropriate sexual behaviour (e.g. drawing of pornographic or sexually explicit images) or knowledge for the child's age
- Promiscuity
- Sudden change in behaviour
- Running away from home
- Wary of adults
- Feeling different from other children
- Unusual avoidance of touch
- Reporting of assault
- Substance abuse (e.g. glue sniffing)
- Emotional withdrawal through lack of trust in adults
- Over-compliance with requests of others
- Frequent complaints of unexplained abdominal pains
- Eating problems
- Sleep disturbances
- Poor peer relationships
- Possessing money or 'gifts' that cannot be adequately accounted for
- Inappropriately sexually explicit drawings or stories

- Enuresis or soiling, especially at the end of the day
- Frequent non-attendance at school
- Avoidance or fear of medical examinations

Emotional Abuse

Physical Indicators

- Failure to thrive
- Delays in physical development or progress

Behavioural Indicators

- Sucking, biting, rocking
- Anti-social, destructive
- Sleep disorders, inhibition of play
- Complaint, passive, aggressive, demanding
- Inappropriately adult or infant
- Impairment of intellectual, emotional, social or behavioural development

3. Abuse by a Pupil

In the case of abuse by a pupil, or a group of pupils, the key issues which identify the problem as abuse are:

- The frequency, nature or severity of the incidents;
- Whether the victim was coerced by physical force, fear, or by a pupil or group of pupils having power or authority over him or her;
- Whether the incident involved a potentially criminal act and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable;

The Utting Report (1997) asserts that “possibly half the total abuse reported in institutions is peer abuse”

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence,¹¹ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment,¹² such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The school has a separate **Child-on-child Abuse Policy**

Bullying

The Old Hall School finds any form of bullying unacceptable and aims to deal with it firmly and effectively as per the school's Anti-Bullying Policy. Members of staff are required to be constantly alert to the problem of bullying and to report all concerns to the DSL and the relevant Class Teacher.

If not challenged and stopped, sustained child-on-child bullying can have profound long-term effects on their victims, and can even be fatal. Child abuse can be perpetrated by another child.

When does bullying turn into child abuse?

The point at which 'bullying' turns, potentially, into 'peer child abuse' is the point at which significant harm is caused, or likely to be caused, to the physical or emotional wellbeing of the victim. If peer child abuse is suspected child protection procedures will be followed and this may include the need to refer abuse to Social Care Safeguarding Team.

4. The Three other Categories of Abuse

● **Discriminatory Abuse**

This abuse is usually motivated by discriminatory and oppressive attitudes towards race, gender, cultural background, religion, physical and/or sensory impairment, sexual orientation and age.

● **Financial Abuse**

Examples include: theft, fraud, exploitation, and pressure in connections with wills, property, possessions or benefits.

● **Institutional Abuse**

This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct.

5. Abuse and Pupils with Special Educational Needs or Disabilities

Pupils with SEN or disabilities are particularly vulnerable and can face additional safeguarding challenges. Some children are at risk of having their body language and behaviour misinterpreted by other children, young people and adults. This is particularly important when pupils have social and communication problems associated with autism or specific medical problems. Some young people display specific indicators of abuse at all times and where these have been shown not to be as a result of abuse it is important to monitor any changes in a child's behaviour, physical condition, emotional state and sociability. Such changes may themselves indicate that abuse is taking place.

Therefore additional barriers can exist when recognising abuse or neglect in this group of children.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further investigation;
- Pupils with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

Staff should read individual pupil files to familiarise themselves with SEND and medical conditions that can present with the same symptoms as abuse.

Because such judgements often require sophisticated knowledge and understanding all staff MUST err on the side of caution. It is better to discuss a hundred cases where no abuse is occurring than to miss one case because a wrong assumption has been made. If there is any worry or concern about a child it must be discussed with the DSL.

6. The Symptoms of Stress and Distress

When a child is suffering from any one or more of the previous four ‘categories of abuse’, he/she will nearly always suffer from/display signs of stress and distress. An abused child is likely to show signs of stress and distress as listed below:

- A lack of concentration and a fall-off in school performance;
- Aggressive or hostile behaviour;
- Moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences;
- Difficulties in relationships with peers;
- Regression to more immature forms of behaviour, e.g. thumb sucking, bed-wetting (or its persistence);
- Self-harming or suicidal behaviour;
- Low self-esteem;
- Wariness, insecurity, running away or truancy – children who persistently run away from home may be escaping from sexual/physical abuse;
- Disturbed sleep;
- General personality changes such as unacceptable behaviour or severe attention seeking behaviour;
- A sudden change in school performance.

7. Parental Signs of Child Abuse

Particular forms of parental behaviour could raise or reinforce concerns:

- Implausible explanation of injuries;
- Unwillingness to seek appropriate medical treatment for injuries;
- Injured child kept away from school until injuries have healed without adequate reason;
- A high level of expressed hostility to the child;
- Grossly unrealistic assumptions about child development;
- Inappropriate labelling of child’s behaviour;
- Leaving children unsupervised when they are too young to be left unattended.

It is important to realise that all types of abuse may be the root cause of other issues such as self-harm which includes eating disorders. For more details on these, please refer to <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/self-harm/>

Grooming, Entrapment, Forced Marriages, FGM, Sexual Violence and Sexual Harassment, CAE, CSE and CCE

Grooming and Entrapment

In the NCPSS briefing on Grooming and Entrapment (July 2012), the definition of grooming is given as “a process by which an individual prepares a child for abuse. This is usually perpetrated by a significant adult in the child’s life either at home or somewhere else in the child’s environment.”

Grooming is a conscious, purposeful, and carefully planned approach used by the offender to gain access to the child, gain the child’s trust and compliance and maintain the child’s secrecy to provide opportunities to abuse and reduce the likelihood of being reported or discovered. This process is thought to strengthen the offender’s abusive pattern of behaviour, as it may be used as a means of justifying or denying their actions.

In the context of education, those who sexually abuse tend to give attention to show affection to potential victims, behaving in a manipulative and coercive manner rather than using violence. They use and abuse their position of trust and authority to befriend pupils and gradually desensitise them to sexualised behaviour, facilitating offending and reducing the likelihood of disclosure.

The process of grooming begins when an abuse targets or selects a victim. The selection of the victim is influenced by the compliance of the pupil and the likelihood of secrecy. Offenders tend to target pupils who they can control. Most children respond to positive attention from a teacher or member of staff, and the praise of teachers can have a huge influence. Victims are often selected because the offender perceives them as vulnerable, isolated, and/or emotionally needy.

Pupils who are not getting on well with their parents or who are expecting some type of emotional difficulty are often targeted not only because they might be responsive to the initial approach from someone in a position of trust, but also because they may be more likely to maintain silence. The offender may begin grooming by giving the pupil special attention, support, or rewards. The power of such rewards to affect the pupil should not be underestimated. Rewards from a teacher or other member of school staff may have a significant impact on the pupil’s motivation and understanding. Rewarding for the purposes of grooming may take place in the context of providing the pupil with additional help, mentoring, advice in relation to a project or coursework, or opportunities for out of school activities, including overnight outings.

The offender uses these legitimate aspects of their role to subtly introduce and increase sexually related communication. This may be done by bringing up sexual matters in discussion, leaving materials related to sex out where the victim can see them or exploiting the victim’s natural curiosity or uncertainty about sex. Touching and physical contact with the victim is gradually increased to test the child’s ability to maintain secrecy and to desensitise the child through progressive sexual behaviours. The offender may also strive to provide the pupil with experiences that are valuable so that the pupil will be reluctant to lose or damage the relationship.

Grooming may also involve the parents of the victim so that the offender can gain their trust and approval. This will allow the offender to have greater access to the victim and enhanced ability to spend time alone with them. Parents are often pleased about the extra attention the teacher is giving their child, perceiving them as a positive

authority figure and role model for their child. However, offenders may also carefully groom victims by systematically separating them from their family and peers. The offender may come to represent the closest relationship the victim has, particularly if the victim is socially isolated or emotionally vulnerable. In such cases, the victim may be reluctant to give up what he or she views as a “loving” relationship. Once isolated, victims are more easily exploited and manipulated into sexual relationships.

Some potential **warning signs of grooming as a precursor to sexual abuse** includes:

- A pupil receiving special attention or preferential treatment;
- Excessive time spent alone with a pupil outside of the classroom;
- Frequently spending time with a pupil in private or isolated areas;
- Transporting a pupil possibly to or from school;
- Making friends with a pupil’s parents and visiting their home;
- Acting as a particular pupil’s “listening ear”;
- Giving small gifts, money, toys, cards, letters to a pupil;
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a pupil;
- Overly affectionate behaviour with a pupil;
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a pupil;
- Other pupils are suspicious and make jokes or references.

The Old Hall School is a school with a strong family ethos and as such, strong, healthy, professional relationships are encouraged in order to provide a safe secure environment in which to thrive and grow. However, any individual at The Old Hall School who has particular concerns about another member of staff should speak to the DSL.

Likewise, all staff should be vigilant with regards to pupil relationships and peer abuse at school. The culture that The Old Hall School aims to foster is one of inclusivity and non-hierarchical. If a member of staff has concerns about inappropriate hierarchy or the abuse of a position of responsibility within the school, they should inform the DSL immediately.

Forced Marriages

The subject of forced marriage is highlighted in ‘Safeguarding Children and Safer Recruitment in Education’. Forced marriage occurs when a young person is forced into a marriage that they do not want, with someone they have not chosen, following coercion intimidation, threats and possibly physical and sexual abuse. It is often – mistakenly – believed to be a religious practice. Forced marriage is an abuse of human rights (The Right to Choose: Multi - agency statutory guidance for dealing with forced marriage, 2008) and a form of domestic abuse which should be dealt with under child protection legislation. Schools are considered as being front line in protecting young people from this type of abuse and they may disclose such a fear to you. Their initial approach may be innocuous – such as talking about a holiday abroad and the fear of a forced marriage may only become apparent after a couple of conversations. If you are concerned that a pupil in The Old Hall School has concerns or fears over forced marriage, either of themselves or a family member, let the Designated Person know immediately.

The following signs and symptoms could indicate that a young person is facing forced marriage. This is likely to involve older children than those at The Old Hall School but the information is included here for completeness.

The presentation of these signs and symptoms could also indicate that there are other difficulties and types of abuse that would also require a referral to Children's Social Care.

- Absence and persistent absence from school;
- Request for extended leave of absence from school and failure to return from visits to country of origin;
- Siblings forced to marry;
- Early marriage of siblings;
- Self-harm or suicide of siblings;
- Running away from home;
- Accompanied to doctors or clinics;
- Self-harm;
- Attempted suicide;
- Being withdrawn from school by those with parental responsibility and not being provided with suitable education at home;
- Sudden announcement of engagement to a stranger;
- A girl may report that she has been taken to the doctor's to be examined to see if she is a virgin;
- Cut or shaved hair as a form of punishment for being disobedient.

Female Genital Mutilation (FGM)

FGM is highlighted as a specific risk to girls and young women and the number of female children affected in the UK is difficult to assess as it is a practice shrouded in secrecy. Concern about the increase of cases of FGM being seen in the UK prompted Ofsted to include and annex in the Inspecting Safeguarding: Briefing for section 5 inspection (Ofsted 2013) which provides an overview of FGM. Staff should be alert to possible signs and the school will demonstrate timely and appropriate action with regards to any pupil thought to be at risk.

FGM involves cutting and removing all or part of, and sometimes sewing the girl's external genitalia, normally without anaesthetic and can take place any time from birth onwards. It can have serious and long-term health implications for girls and women. FGM has been a criminal offence in the UK since 1985.

The indications below may highlight that FGM is being planned and further investigation should take place to exclude the risks of FGM:

- Parents from practising communities state that they or a relative will take the child out of the country for a prolonged period;
- A child may talk about a long holiday to her country of origin or another country;
- Where the practice of FGM is prevalent, including African countries and the Middle East;
- A child may request help from a teacher or another adult;
- Any female child born to a woman who has been subject to FGM must be considered to be at risk, as must other female children in the extended family;
- Any female child who has a sister who has already undergone FGM must be considered to be at risk, as must other female children in the extended family.

Indication that FGM may have already taken place include:

- A child may spend long periods of time away from the classroom during the day with bladder or menstrual problems;
- A child may have difficulty walking, sitting or standing;
- There may be prolonged absences from school;
- A prolonged absence from school with noticeable behaviour changes in the girl's return could be an indication that a girl has recently undergone FGM;
- Professionals also need to be vigilant to the emotional and psychological needs of children who may / are suffering the adverse consequences of the practice, e.g. withdrawal, depression, etc;
- A child may ask for help or confide in a professional;
- A child requiring to be excused from physical exercise lessons without the support of her GP;
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain.

Serious Violence

All staff should be aware of indicators, which may signal that a child or children is/are at risk from, or are involved with serious violent crime. These may include:

- Absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm;
- A significant change in wellbeing;
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could indicate that the child or children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Child Sexual Exploitations (CSE) and Child Criminal Exploitations (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.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Further information about CCE and CSE, including definitions and indicators, is in KCSIE 2024, Annex B.

Sexual Violence and Sexual Harassment between Children in Schools

The Old Hall School accepts that sexual violence and sexual harassment can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group

of children. Whilst this would be considered a very rare event at The Old Hall School, staff should remain aware that it could happen within our community and must treat any allegations made.

This school will treat sexual violence and sexual harassment in line with any other child protection concern.

Context

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, it may also include initiation/hazing they can occur online and offline (both physical and verbal) and are never acceptable. It is important in our setting that all victims are taken seriously and offered appropriate support in a non-judgemental way and on a case by case basis. Staff will act in the best interest of the child. In light of this we will consider:

- ✓ The nature of the alleged incident
 - ✓ The ages of the children involved
 - ✓ Any power imbalance between children
 - ✓ Is the incident a one-off or a sustained pattern of abuse
 - ✓ Are there ongoing risks to the victim, other children, school and college staff
 - ✓ Contextual safeguarding issues
 - ✓ The rights of children to receive an education
- Established research suggests it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.
 - **This school will have a whole school approach in:**
 - Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
 - Not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'; and
 - Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia: dismissing or tolerating such behaviours risks normalising them.
 - **Children with Special Educational Needs and Disabilities (SEND)** can be especially vulnerable. Research states that disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:
 - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - The potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs;
 - Communication barriers and difficulties overcoming these barriers.
 - Established research found that **children who are Lesbian, Gay, Bi, Trans or Questioning (LGBTQ+)** can be targeted by their peers, which may put them at greater risk from harm. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. The school will ensure that children who may be LGBTQ+ have a trusted adult who they can be open with.
 - We as a school will ensure that designated school **staff understand consent**. It will be especially important if a child is making a disclosure that suggests they might have been raped. Additional information from the CPS around consent will be sought and will be especially helpful for the school's DSL

and the deputies where the above definition is clearly set out. Consultation will be sought through Family Connect for practical advice and support in this particularly sensitive area.

- In addition, and where necessary for effective safeguarding this school will utilise/seek resources and seek support from established sources. This school will consider the [brook traffic light tool](#). For an initial scoping we may consider the advice given from TWSCB.
- This school will, as necessary, seek advice on harmful sexual behaviours from the specialist sexual violence sector for a whole school approach. We will **consult in the first instance with Family Connect** for advice and support and seek advice around how best to deal with any issues.
- In relation to sexting, also known as **youth produced sexual imagery**, this school will where necessary consult with guidance produced by The UK Council for Child Internet Safety (UKCCIS) Education Group “Sexting in Schools and Colleges” and Department of Education document “Searching, screening and confiscation” January 2018. The DSL (or Deputy) will take the lead on these issues <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>
Staff should be conversant with the school’s Youth Produced Sexual Imagery Policy as contained in the school’s E-Safety and Online Policies document.
- It is important in this school that policies and procedures are developed in line with legal obligations, including the Human Rights Act 1998 and the Equality Act 2010 and especially the Public Sector Equality Duty.
- This school will, as necessary, seek advice on harmful sexual behaviours from the specialist sexual violence sector for a whole school approach. NSPCC and NICE guidance <https://www.nice.org.uk/guidance/ng55> for advice on developing interventions; working with families and carers; and multi-agency working.

CAE – Children Absent in Education

I. Definition and Overview

The statutory guidance [Children Missing Education \(September 2016\)](#) sets out the key principles to enable local authorities in England to implement their legal duty under section 436A of the Education Act 1996 to make arrangements to identify, as far as it is possible to do so, children missing education (CAE). Local authorities should be able to demonstrate that they have considered this statutory guidance and, where it is not followed, the local authority should have reasonable grounds for not doing so.

We believe children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. Our response to persistently absent pupils and children missing education will support identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children’s social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where children leave the classroom or leave our grounds without permission, this is covered within our positive relations and behaviour policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); ‘Anyone who has care of a child without parental responsibility may do what is “reasonable” in all the circumstances to safeguard and promote the child’s welfare. It is likely to be “reasonable” to inform the police, or children’s services departments, and, if appropriate, their parents, of the child/young person’s safety and whereabouts’. However, in principle, if a pupil runs out of class we will establish where he or she has gone. Staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any children who have taken themselves out of our building and possibly out of our grounds, unless this watchful eye provokes the

child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the premises, we will contact parents in the first instance. If they are not contactable, we will inform the police that a pupil has left and is at risk.

1. All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have;
2. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life;
3. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.

[Statutory guidance for local authorities: Children missing education \(September 2016\).](#)

2. Risks

These 'missing/ absent' children can be vulnerable; it is essential that all services work together to identify and re-engage these children back into appropriate education provision as quickly as possible. It is important to establish the reasons for the child being missing at the earliest possible stage.

Possible reasons that should be considered include:

- Failure to start appropriate provision and never enter the system;
- Stopped attending, due to illegal exclusion or withdrawal by parent/carers;
- Failure to complete a transition between schools;
- Children from refugee and asylum seeking families;
- Children from families who are highly mobile;
- Children at risk of a forced marriage;
- Children experiencing abuse and neglect.

Children who remain disengaged from education are potentially exposed to higher degrees of risk.

Children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or abduction as well as missing education.

When families move between local authority areas it can sometimes lead to a child becoming 'lost' in the system and consequently missing education. Where a child has moved, local authorities should check with other local authorities - either regionally or nationally - and share information in order to ascertain where a child has moved. Once the location of the child is established, the relevant local authority must ensure that the child is receiving an education either by attending a school or the provision of electronic or distance learning packages where these are available.

Research has shown that many children from Gypsy, Roma and Traveller (GRT) families can become disengaged from education, particularly during the secondary school phase. It is therefore important that schools inform the local authority when a GRT pupil leaves the school without identifying a new destination school, particularly in the transition from primary to secondary so that they can attempt to facilitate continuity of the child's education.

Although many are settled, some GRT families move regularly and their children can be at increased risk of missing education. Local authority Traveller Education Support Services (TESS), where these exist, or the named CAE officer within the local authority, can advise schools on the best strategies for ensuring the minimum disruption to GRT pupils' education.

Families of members of the Armed Forces are likely to move frequently - both in the UK and overseas and often at short notice. Schools and local authorities should contact the MoD [Children's Education Advisory Service \(CEAS\)](#) for advice on making arrangements to ensure continuity of education for those children when the family moves.

Children who have offended or are at risk of doing so are also at risk of disengaging from education. Local authority Youth Offending Teams (YOTs) are responsible for supervising those young people (aged 8 to 18). YOTs should work with the local authority CAE officer to ensure that children are receiving, or return to, appropriate full-time education.

3. Indicators

Schools

As a result of daily admissions registration, schools are particularly well placed to notice when a child has gone missing. If a member of school/educational establishment/college staff becomes aware that a child may have run away or gone missing, they should try to establish with the parents/ carers, what has happened.

If this is not possible, or the child is missing, the designated safeguarding teacher/advisor should, together with the class teacher, assess the child's vulnerability by making reasonable enquiries, and refer (see also [Telford & Wrekin Threshold Guidance](#)) any concerns about the child to Family Connect.

Schools should monitor attendance closely and address poor or irregular attendance. It is important that pupils' poor attendance is referred to the local authority.

The recognised figure for severely absent is 50% or less and persistent absence is being less than 90%, although concerns may still be raised if above this.

In the more general circumstances of a child going missing who is not known to any other agencies, the Head Teacher should inform the Pupil Tracking Officer and Education Welfare Officer of any child who has not attended for 10 consecutive school days without provision of reasonable explanation.

In the more general circumstances of a child going missing who is not known to any other agencies, the Head Teacher should inform the Pupil Tracking Officer and Education Welfare Officer of any child who has not attended for 10 consecutive school days without provision of a reasonable explanation.

Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. Further information about schools' safeguarding responsibilities can be found in 'Keeping Children Safe in Education' the statutory guidance.

All schools are required to notify the local authority within five days when a pupil's name is added to the admission register at a non-standard transition point. Schools will need to provide the local authority with all the information held within the admission register about the pupil.

Schools must notify the local authority when a pupil's name is to be removed from the admission register at a non-standard transition point under any of the fifteen grounds set out in the regulations, as soon as the ground for removal is met and no later than the time at which the pupil's name is removed from the register.

In line with the duty under section 10 of the Children Act 2004, the expectation is that the school and the local authority will have in place procedures designed to carry out reasonable enquiries. The type of procedures may include the appropriate person checking with relatives, neighbours, landlords - private or social housing providers - and other local stakeholders who are involved. They should also record that they have completed these

procedures. If there is reason to believe a child is in immediate danger or at risk of harm, a referral (see [Telford & Wrekin Threshold Guidance](#)) should be made to children's social care (and the police if appropriate).

Other Agencies

Where any agency in contact with children and families believes that a child is not on the roll of a school or receiving education otherwise, then this information should be passed to the Pupil Tracking Officer with any details they have of the child in question. If they have concerns about the welfare of the child they should refer to Children's Services.

Pupil Tracking Officer

The Pupil Tracking Officer (or CAE Officer) should ensure through the Education Welfare Officer that reasonable enquiries are made - e.g. home visits, liaison with Children's Services and/or Housing - and notify the school if it appears that the child has moved out of the area.

If no information is forthcoming within 2 days, the Pupil Tracking Officer should alert her/his manager, who should inform Children's Services and the Police in writing.

4. Protection and Action to be Taken

Head teachers should inform the Pupil Tracking Officer and the child's social worker immediately that a child subject to a Child Protection Plan is missing.

In the following circumstances a referral to Children's Services and / or the police should always be made promptly:

- The child may be the victim of a crime;
- The child is subject of a Child Protection Plan;
- The child is subject of Section 47 enquiries;
- The child is looked after;
- There is a known person posing a risk to children in the household or in contact with the household;
- There is a history of the family moving frequently;
- There are serious issues with attendance.

Where a child on a school roll is missing, the child's name may not be removed from the school roll until s/he has been continuously absent for at least 4 weeks and both the school and the education service have failed, after reasonable enquiry, to locate the pupil and her/his family. After 4 weeks the child's Common Transfer file should be uploaded to the Department for Education secure site for the transfer of pupil information when a pupil moves between schools. The CAE Officer in the Local Authority must also be informed.

In these circumstances the child's name is kept on a centrally held register, and should be clearly identified as missing from education.

Where the child's name has been removed from the school roll, but s/he has not been located, the Head Teacher should arrange for the pupil's records to be retained until the child is located. They may be held centrally according to local arrangements.

Where a Head Teacher has been notified by a parent that a pupil is receiving education other than at school, and has removed the child's name from the school roll, notification must be given to the education service within 10 school days; the pupil's records should then be transferred to the education service to be stored in accordance with local arrangements.

If a school receives a new pupil without receiving information about the pupil from his or her previous school, the school should contact the Pupil Tracking Officer.

If the Pupil Tracking Officer becomes aware the child has moved to another school s/he should ensure that all relevant agencies are informed and arrangements made to forward records from the previous school.

5. Issues

A child missing from education is not in itself a child protection matter, and there may be an innocent explanation for this. However, regular school attendance is an important safeguard and unexplained non-attendance can be an early indicator of problems, risk and vulnerability.

Schools should endeavour to deal with this problem in three ways:

- By preventing poor school attendance and truancy;
- By acting once absence has occurred to establish children's safety and try to get them back to school;
- By taking action to trace children whose whereabouts are not known.

Appendix 6

Advice When Answering Questions

Offering Advice

The role of the teacher is vital to the ethos of the school's pastoral system and part of the role will necessarily involve talking to pupils on personal matters and matters of concern. However, the 1992 Education Act places certain constraints on the role of the teacher as confidant. If a pupil asks a teacher for advice on sexual matters or for information pertaining to sexual matters, the teacher must not trespass on the parents' rights and responsibilities. Therefore, the teacher should encourage the pupil to seek advice from his or her parents.

Explicit Questions

It is inappropriate to deal with a pupil's explicit questions by dealing with it in front of the whole class. In practice this means that teachers have to say, "I'm sorry but the school's policy and legislation does not allow me to answer that question". The teacher must speak with the DSL, who may deem it appropriate to discuss the child's concerns with the parents – a decision may then be taken on how best to deal with it. Answers to the 'questions in a box' approach in Year 6 Sex Education must only be given after a very careful screening of the questions. In all cases of explicit questions being asked by a child to a member of staff, abuse should only be suspected when the questions are totally inappropriate to the age of the child.

Appendix 7

The Key Worker and Child Protection Case Conferences

The Key Worker

Every child placed on the Child Protection Register has a named Key Worker, who is either a member of the Social Services Department or the NSPCC. It is the Key Worker's responsibility to coordinate inter-agency activity. Staff in educational establishments can make a vital contribution in advising and assisting the Key Worker, and to cooperate fully with the Key Worker in providing information, preparing assessments, implementing plans and in supporting the child, as appropriate. This may occasionally involve liaising with other agencies during the school holidays.

Case Conferences

A case conference is called when there has been a Child Protection Investigation. It is not a forum for a formal decision that a person has abused a child, but it should identify those adults who present, or are thought to present, risks to the child – it is the courts who decide the guilt of a person on child abuse charges. Although case conferences are normally covered by the Social Services Department, other agencies, including education department staff, may request a case conference. Participation may be limited to those who have a need to know or a contribution to make, and this will always include staff in schools. Even if alleged abuse had not been identified in the school, the Head should automatically be invited to attend the initial case conference as he will undoubtedly have invaluable information to contribute. The conference will take **decisions** on the following:

- Whether to place the child on the child protection register;
- The category of abuse under which the child's name should be entered;
- Any plans to protect the child in the future;
- Whether to place the name of the parents/guardians or any other adult on a register of abusers.

A Key Worker will be assigned, either a social worker or an NSPCC official, to take responsibility for the child's welfare between case conferences.

Staff in schools may need to be aware of any recommendations made at the case conference and in a Child Protection Plan in order to ensure continuing care for the child. It may be necessary to attend case conferences held in school holidays and the DSL will need to make arrangements as appropriate.

The conference can make **recommendations** to the relevant support agencies on the following issues:

The Child Protection Plan, which will cover:

- Help being offered to the child;
- How often the Key Worker and other professionals will see the child and family;
- The purpose of the meetings with each professional;
- Financial assistance;
- Whether the police should investigate an alleged criminal offence;

- Whether the child's health should be investigated by a doctor or psychiatrist;
- Whether the child should be voluntarily accommodated by social services;
- Whether legal action should be taken by social services or the NSPCC, for example a child assessment order (section 43), an emergency protection order (section 44), a care and supervision order (section 31), or an educational supervision order (section 36).

Parents are encouraged to attend case conferences, but local procedures specify the level of involvement. Some LSCBs allow parents only at the beginning to make an initial statement, and then at the end to hear what decisions have been made. A parent can be excluded for much of the conference if there is evidence that he/she can be violent or has severe mental problems, or arrived intoxicated. A teacher who feels threatened by a violent parent should let the person chairing the conference know. If no protection is offered, or if it is decided that the parent will not be excluded, the teacher may opt to submit written evidence rather than attending in person. Parents have the right to attend with a representative or solicitor but teachers do not. Teachers who are required to give evidence should prepare a written statement in advance of the conference; union members should submit the statement to their union headquarters for advice.

At the conference itself, a teacher needs only to read out this statement; any subsequent oral evidence can be given within the confines of the statement. Teachers should offer only **professional** opinions based on their knowledge and experience **as teachers**.

Case conference records are confidential and schools must ensure the safekeeping of such records and of other documents for individual cases and the eventual secure destruction of such records. Information given at case conferences must not be disclosed without the proper permission of the person who originally supplied the information. The Education (Schools Records) Regulations 1989 exempts any information relating to actual, alleged or suspected child abuse from the requirements of disclosure. When a pupil transfers school all relevant concerns and/or records must be forwarded.

Appendix 8a - Record Keeping Templates and Documents

TEMPLATE FOR RECORDING INCIDENTS/LOW LEVEL CONCERNS*

Child's First name:	Surname:	DOB
School Year:	Date and time of incident (include year)	
Class/Form:		

(Child's address etc to be completed by the DSL)

Address:	Telephone:
Are there other children in the family? If yes, please give details.	

Nature of concern or incident. Please give details of when and where it took place and who witnessed the concern or incident		
If you require more space please attach a separate sheet to this form.		
Who else informed and any other further action <i>NB You must inform the relevant social worker if child has a CP plan or is an open CSC case</i>		
Signed	Designation	Date/Time of record

To be completed by the DSL

Date form passed to DSL	Number of previous concerns
Further action agreed Yes / No	Signed DSL
Pre CAF Assessment Yes / No	Reason

**A concern is when the care of a child is less than may be expected from a reasonable parent, or when a child's behaviour indicates they may not be receiving an adequate level of care but this does not amount to an allegation disclosure or child abuse concern*

Concern sheets should be passed to the DSL for overview, collation and any further necessary action. This may also be adapted for use on CPOMS where the DSL can be alerted.



Appendix 8b - Record Keeping Templates and Documents

CHILD PROTECTION CONCERN/DISCLOSURE FORM

Child's First name:	Surname:	DOB
House: Year:	Date and time of incident (include year)	

(Child's address etc to be completed by the DSL)

Address:	Telephone:
Are there other children in the family? If yes, please give details.	

Source(s) of concern:
Nature of Concern:
Action Taken:
Further Action to be Taken (if necessary):
(To be completed by the DSL)

Signed:
(By the person raising the concern)

Print Name:

Date:

Signed:

(DSL)

Date:

Appendix 8c - Record Keeping Templates and Documents

Front Sheet: Child Protection Record

Name of child:	Date of birth:
Any other names by which child known:	Date file started:
Address:	Other family /household members Include full name and relationship. For UI8s, include age, if known.
Telephone:	
Are any other child protection files held in school relating to this child or another child closely connected to him/her? YES/NO - If YES give details	
Name and contact number of key worker (Children's Social Care Services), if known	Name and contact number of GP, if known
Other agency involvement – name, agency and contact number	

Appendix 8d - Record Keeping Templates and Documents

Child Protection Chronology of Significant Events

Include nagging doubts, referrals to CSCS, Case Conferences, Core Group Meetings

Date	Event	Notes	Further details in file Y/N	Signed/role of record keeper

Checklist

For handling and recording allegations or complaints made against a member of staff or volunteer

(For use by the DSL)

1.	Name and position of member of staff who is subject of allegation/complaint:	
2.	Is the complaint written or verbal?	
3.	Who has made the complaint?	
	Relationship to child:	
4.	Name of child:	D.O.B: Age:
5.	Parents'/Carers name:	Parents'/Carers address:
6.	Date of alleged incident/s:	
7.	Did the child attend school on this/these dates?	
8.	Nature of the complaint (please use a continuation sheet if necessary)	
9.	Other relevant information:	
10	LADO contacted:	Date:
	Further action advised by Children's Services:	

Yes / No Checklist

	Do you have details (either a written account or notes from a verbal account) of the alleged incident, signed and dated?	Y / N
	Have you checked the incident could actually have taken place (i.e. was the child in the lesson and was the member of staff teaching the lesson that day)?	Y / N
	Is there evidence of significant harm, e.g. a visible injury?	Y / N
	Has a criminal offence taken place, e.g. has excessive force been used that could be classed as an assault?	Y / N
	Has the incident been reported to anyone else, e.g. the Police?	Y / N
	Were there any witnesses to the incident – if so, have you made a note of names?	Y / N
	Are parents aware of the allegation?	Y / N
	Is the member of staff aware of the allegation?	Y / N
	Have you reported the allegation to the LADO?	Y / N

Remember - do not attempt to investigate the allegation yourself.

Your name:

Position:

Signature:

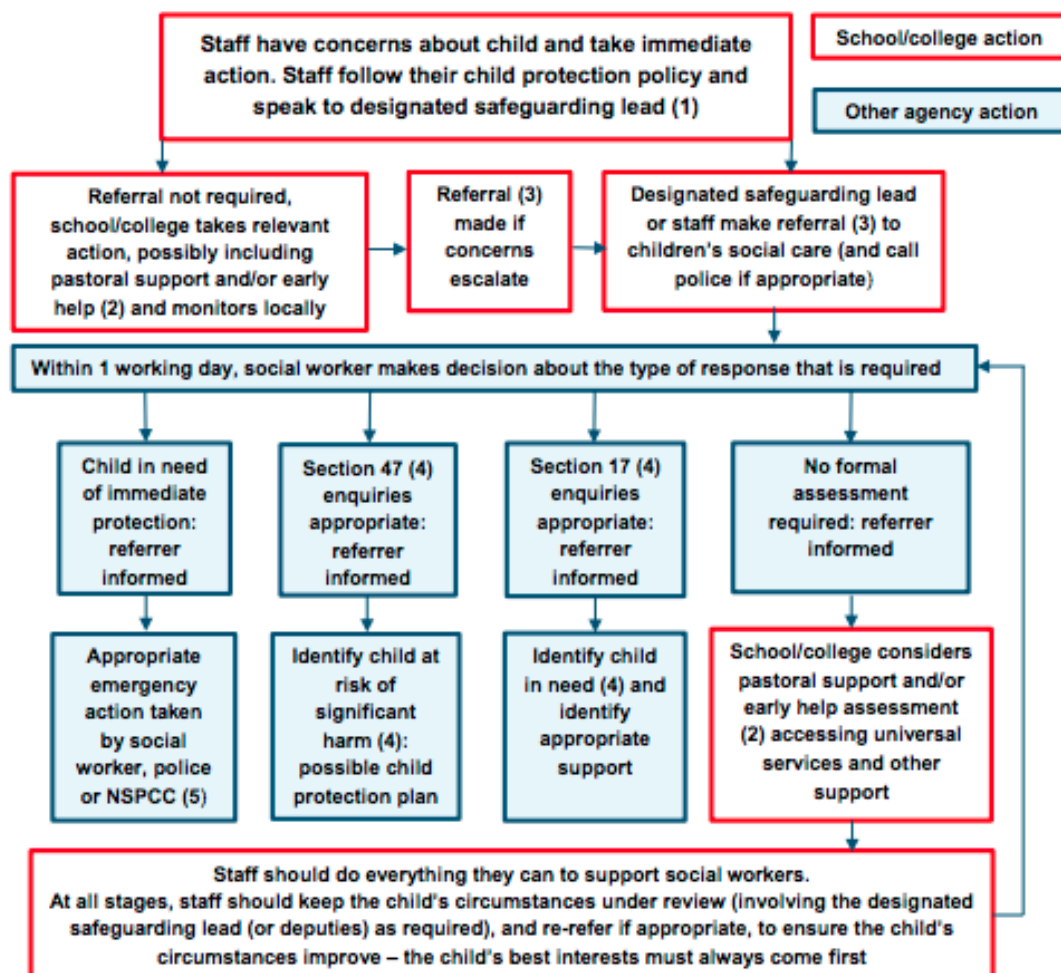
Date:



Actions where there are concerns about a child

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Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix I I



Transfer Form for Safeguarding Records between Educational Establishments

Name of child:	Date of Birth:
Unique Reference Number if applicable:	
Child's Home Address:	

Name of originating establishment:
Name of current Designated Safeguarding Lead:
Date file exchanged by hand:
Date file posted by recorded delivery:
Date information sent electronically:

Name of receiving establishment:
Address of receiving establishment:
Name of Designated Safeguarding Lead:
Date file received by hand:
Date file received by recorded delivery:
Date information received electronically:
Signature of receiving Designated Safeguarding Lead:

Upon receipt, the receiving setting should:

- Sign this form and keep a copy with the child's safeguarding records
- Ensure the original form is returned to the originating establishment without delay
- The originating establishment should keep the returned form securely in line with the Telford & Wrekin Guidance on the Transfer and Retention of Safeguarding Records



Telford and Wrekin Safeguarding Partnership

Best Practice Guidance Fabricated or Induced Illness

1. Definition

Fabricated or induced illness (FI) is a condition whereby a child suffers harm through the deliberate action of her/his main carer and which is attributed by the adult to another cause. This was previously known as Munchausen's Syndrome by Proxy.

It is a relatively rare but potentially lethal form of abuse.

Concerns will be raised for a small number of children when it is considered that the health or development of a child is likely to be significantly impaired or further impaired by the actions of a carer or carers having fabricated or induced illness.

It is important that the focus is on the outcomes or impact on the child's health and development and not initially on attempts to diagnose the parent or carer.

The range of symptoms and body systems involved in the spectrum of fabricated or induced illness are extremely wide.

Investigation of fabricated and induced illness and assessment of significant harm to a child falls under statutory framework provided by Working Together 2018 and [Safeguarding Children in Whom Illness is Fabricated or Induced](#) (Supplementary guidance to Working Together to Safeguard Children. HM Government 2008)

2. Carer's Behaviour

There are a number of ways of the carer fabricating or inducing illness in a child. These include:

- Fabrication of signs and symptoms, including fabrication of past medical history and psychological illness;

- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluids;
- Exaggeration of symptoms/real problems. This may lead to unnecessary investigations, treatment and/or special equipment being provided;
- Induction of illness by a variety of means, including by administering medication or other substances, by means of intentional obstruction of the airway or by interfering with the child's body in order to cause physical signs; and / or
- Obtaining specialist treatments or equipment for children who do not require them.

The above methods are not mutually exclusive.

Harm to the child may be caused through unnecessary or invasive medical treatment, which may be harmful and possibly dangerous, based on symptoms that are falsely described or deliberately manufactured by the carer, and lack independent corroboration.

3. Indicators

- Reported symptoms and signs found on examination are not explained by any medical condition from which the child may be suffering; or
- Physical examination and results of medical investigations do not explain reported symptoms and signs; or
- There is an inexplicably poor response to prescribed medication and other treatment; or
- New symptoms are reported on resolution of previous ones; or
- Reported symptoms and found signs are not observed in the absence of the carer; or
- Over time the child is repeatedly presented with a range of symptoms to different professionals in a variety of settings; or
- The child's normal, daily life activities, such as attending school, are being curtailed beyond that which might be expected from any known medical disorder from which the child is known to suffer;
- Excessive use of any medical website or alternative opinions.

There may be a number of explanations for these circumstances and each requires careful consideration and review.

Concerns may also be raised by health professionals to whom a child is presented or they come into contact with. However other professionals, who are working with the child and/or

parents/carers may have cause for concern or notice discrepancies between reported and observed medical conditions.

4. Protection and Action to be Taken

- The dawning of concerns is a crucial time;
- This critical threshold is a matter of individual professional judgement; a preliminary consultation with your safeguarding children Lead/Named or Designated professional/manager should be undertaken. If the concern that FII is a possibility persists, there should be discussion with the Responsible Paediatric Consultant (RPC) within Health for a specialist medical opinion.
- Reasonable suspicion of FII warrants the early and active involvement of statutory agencies;
- Upon receipt of the medical opinion, the [Telford & Wrekin Threshold Guidance](#) should be used to inform the decision making.
- At the point of identification the RPC will prepare the Safeguarding children in whom fabricated or induced illness Checklist, in preparation for the Strategy meeting;
- The agency who identified the concerns should report the concern to Family Connect, upon which a strategy meeting will be convened.
- The referral must include the:
 - Rational as to why they suspect FII;
 - Be clear and concise;
 - Factual;
 - Evidence based; include the validation from the RPC.
- The RPC must attend the strategy meeting and ensure the safeguarding children in whom fabricated or induced illness checklist is completed.

Joint working is essential, and all agencies and professionals should:

- Be alert to potential indicators of illness being fabricated or induced in a child;
- Be alert to the risk of harm which individual abusers may pose to children in whom illness is being fabricated or induced;
- Share and help to analyse information so that an informed assessment can be made of Children's needs and circumstances including an up to date Chronology; and
- Contribute to whatever action and services are required to safeguard and promote the child's welfare.
-

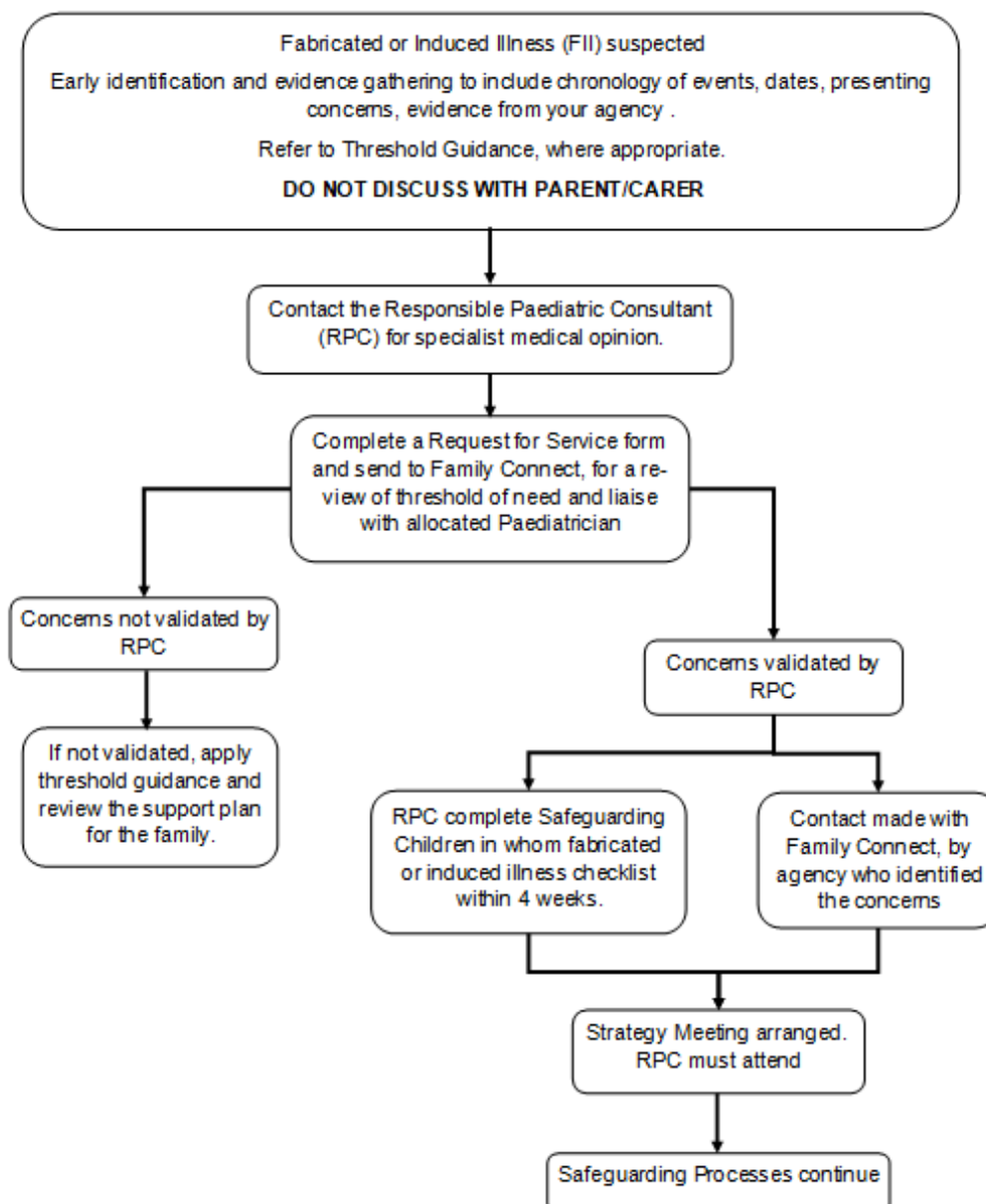
5. Health Professional

Upon closure of the case health professionals will provide all professionals involved with working on the case, with confirmation of the remaining diagnosis and how to manage any presenting health needs.

6. Escalation and Resolution of disagreements

Please refer to the Telford & Wrekin Safeguarding Partnership Escalation Policy

7. Pathway

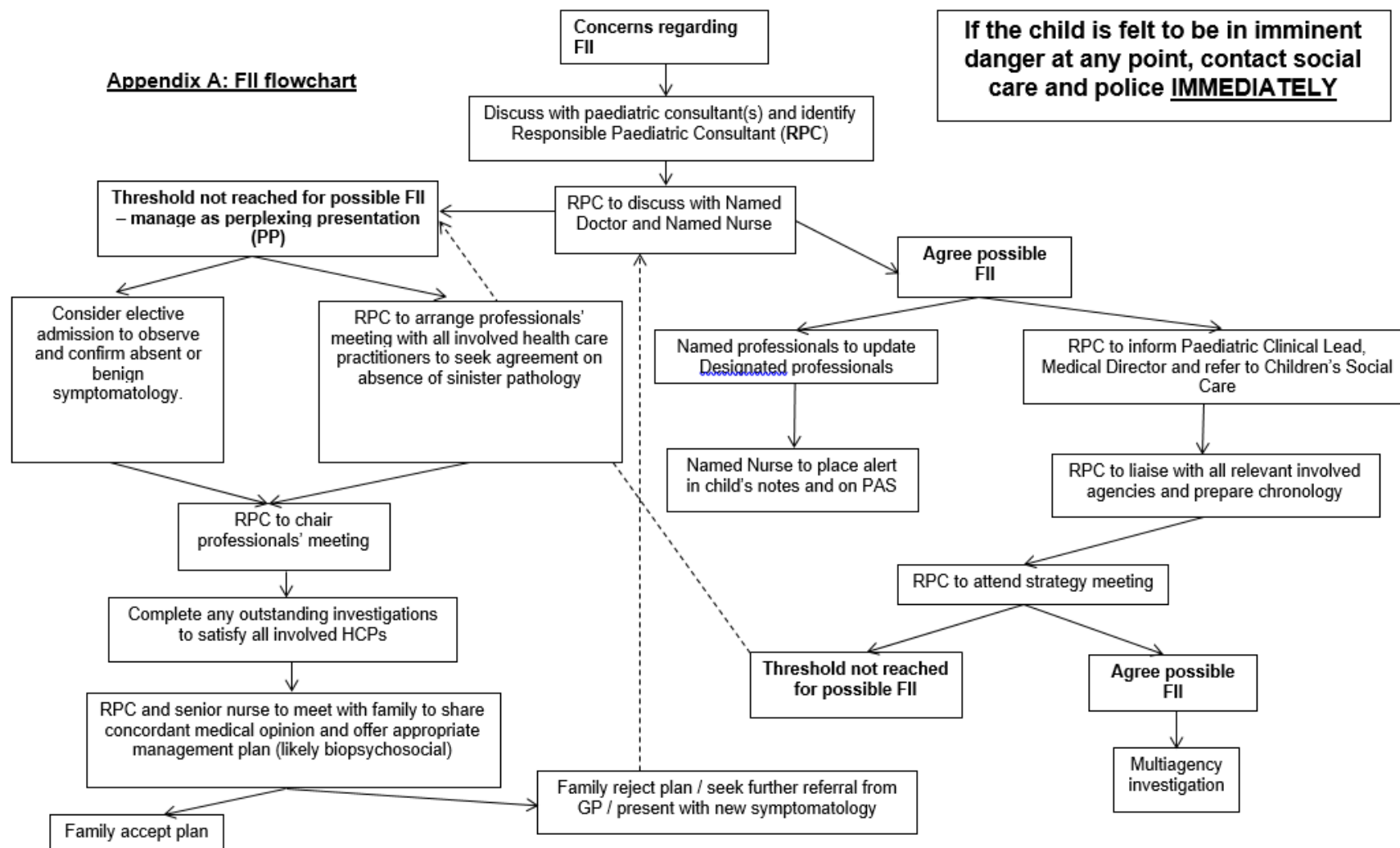


8. References

- a. West Midlands Policy and Procedure, Chapter 2.6 Fabricated or Induced Illness
<http://westmidlands.procedures.org.uk/pkphp/regional-safeguarding-guidance/fabricated-or-induced-illness>
- b. NHS Choices - Fabricated or Induced Illness
<https://www.nhs.uk/conditions/fabricated-or-induced-illness/>
- c. Safeguarding children in whom illness is fabricated or induced
<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>
- d. HM Government - Safeguarding Children in whom illness is fabricated or Induced (Supplementary Guidance to Working Together to safeguard Children)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf
- e. Fabricated or Induced illness (FII) by carers – a practical guide for paediatricians
<https://www.rcpch.ac.uk/resources/fabricated-or-induced-illness-fii-carers-practical-guide-paediatricians>

Sub-Appendix I – The Shrewsbury and Telford Hospital NHS Trust Guideline for Safeguarding Children in whom Illness is Fabricated or Induced. Version 2

Appendix A: FII flowchart



Safeguarding Children in whom Illness is Fabricated or Induced (Version 2) Dec 2018- Dec 2022

Sub-Appendix 2 Case Review Chronology Form



Case Review Chronology Form

NHS Number if known:

Child's Full Name:

Parents/ Carers Full Names

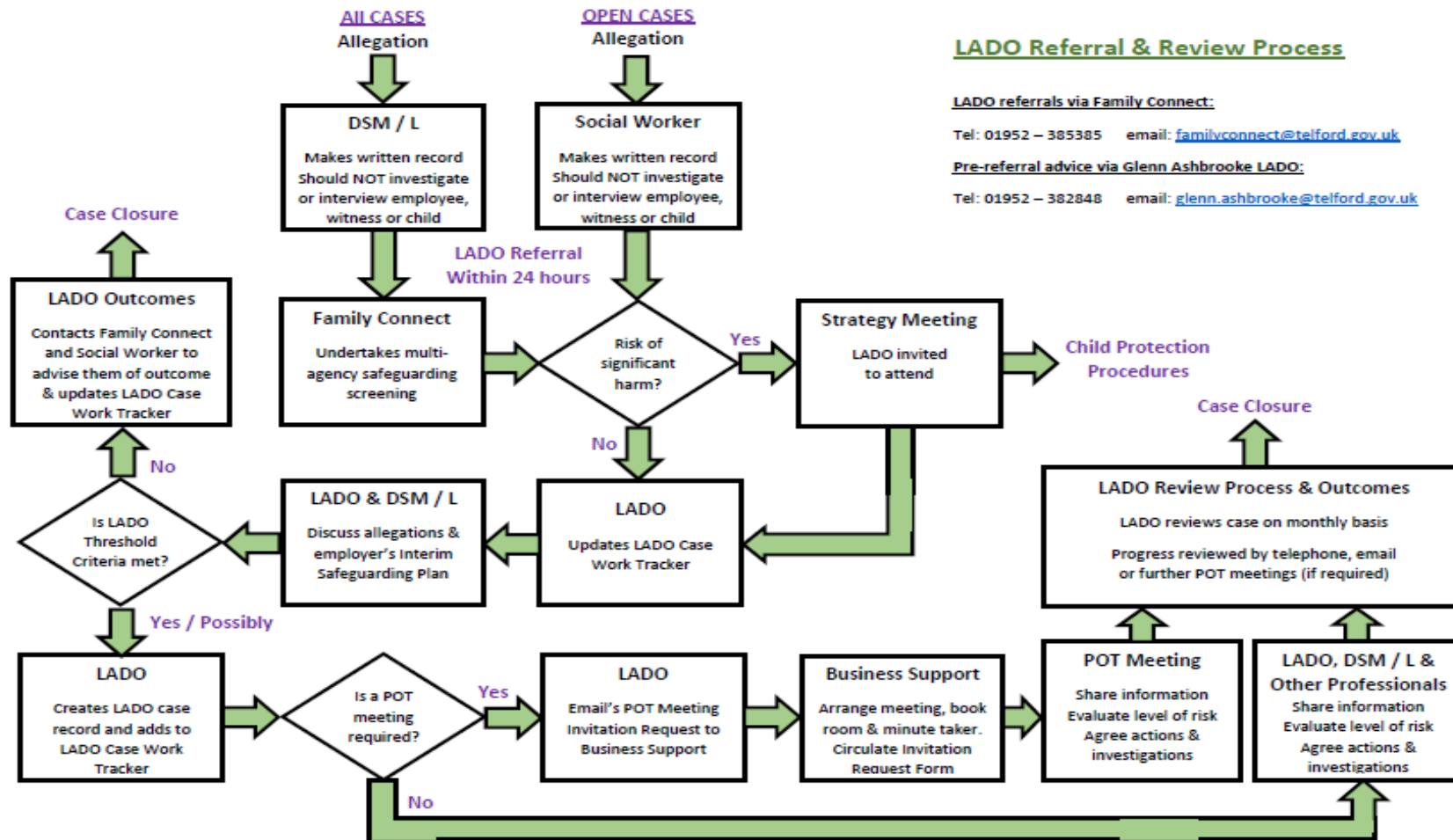
Date chronology completed:

Agency:

Date	Source	Event	Action taken	Actual/potential impact/harm on child	Template category (Appendix C)

Appendix I3

Telford and Wrekin procedures for managing safeguarding concerns and allegations



Telford & Wrekin Council procedures: *These procedures should be read in line with our child protection & safeguarding policy.*