

# Child protection and safeguarding



Growth Learning Therapies

Written by:	Alison Neal / Joanna Curley	Date:	August 2020
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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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## 1. Aims

This Child Protection Policy outlines the principles and practices to ensure the safety and wellbeing of children engaged with our organization. It is aligned with national legislation and international conventions, including the United Nations Convention on the Rights of the Child (UNCRC).

All staff are aware of their statutory responsibilities with respect to safeguarding.

Staff are properly training in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children





Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

[The Human Rights Act 1998](#) which states being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to schools under the European Convention on Human Rights (ECHR)

[Equality Act 2010](#): which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

[Public Sector Equality Duty \(PSED\)](#): which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.

[The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the '2018 Childcare Disqualification Regulations') and [Childcare Act 2006](#), which set out who is disqualified from working with children.

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- ❖ 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



**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- ❖ The local authority (LA)
- ❖ Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- ❖ The chief officer of police for an area in the LA area

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

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

### 3.1 Scope and responsibilities

***Safeguarding and promoting the welfare of the children at Little Acorns School is everyone's responsibility. Staff should at all times consider what is in the best interest of the child.***

Little Acorns is committed to Safeguarding the welfare of Children. We offer a range of services to Children which we recognise may have a powerful and positive influence on them. It is our aim to aid the development of self-esteem and social awareness and to provide opportunities for enjoyment with personal achievement and positive experiences.

It is important for that improving sense of self that the children at our school are aware that there is strategy and procedure for their protection and that all adults in their environment are able to protect them adequately. Appropriate to age and stage it is also important that children are able to have a knowledge themselves of the procedures and have a forum to make suggestions so that they may help shape our Service.

The wide ranging nature of the Little Acorns work gives many staff substantial one-to-one access to children in order to build the high quality relationships that these children require, however, it is not only these staff who are addressed in this Policy. This Policy applies to all staff that may come into contact with





Children in the course of their work, whether in School, Home or anywhere else on our Services premises or in the wider community.

As many staff are in regular contact with Children they are in a position to observe outward signs of abuse and can and should alert others when such signs are observed. Little Acorns and all of its staff have a responsibility to be proactive, and to refer suspected cases of abuse to Kent Safeguarding Children Multi Agency Partnership (KSCMP).

All staff and volunteers, and any contractors who visit the site more frequently than once per month on a regular basis will have an enhanced DBS disclosure. Any professionals offering additional services to the Children in our care such as sports clubs, therapies etc. will have their own Safeguarding Policy to abide by and an enhanced DBS disclosure. Little Acorns must be familiar with the service or club and satisfied that the individual has these relevant documents before a Child can be left unattended in their care.

Those who work with Children have a responsibility to safeguard and promote their welfare. This is an important responsibility and requires vigilance. You will need to be able to recognise when a Child may not be achieving their developmental potential or their health may be impaired, and be able to identify appropriate sources of help for them.

The responsibility for decision making over issues of child protection lies with Kent County Council, the local authority for the area we are based. Little Acorns has developed links with the KSCMP and will ensure that our Safeguarding and Child Protection procedures are in accordance with both Kent Safeguarding Children procedures and the children's responsible/placing authority procedures. These will be available on site. See contact details below.

Little Acorns recognizes successful outcomes for children depend on strong multi-agency partnership working across the whole system of help, support and protection including effective work from all agencies with parents, carers, and families. This includes principles for working with parents and carers to centre the importance of building positive, trusting, and co-operative relationships to deliver tailored support to families, and expectations for multi-agency working that apply to all individuals, agencies and organisations working with children and their families, across a range of roles and activities.

For children placed outside of their 'home' authority, the local authority in which they are placed may choose to liaise with the child's responsible authority over aspects of child protection investigations.

It is not Little Acorns responsibility to determine who does what externally, but staff do have a role in supporting investigations e.g. through providing timely and accurate information.

### 3.2 Guiding Principles

- ❖ The welfare of the child is paramount.
- ❖ All children, regardless of age, gender, ability, race, religion, or background, have equal rights to protection.
- ❖ All staff, volunteers, and contractors share responsibility for safeguarding children.
- ❖ Children should be heard, consulted, and involved in decisions affecting them.

## 4. Equality statement

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





We give special consideration to children who:

- ❖ Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- ❖ Are young carers
- ❖ May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- ❖ Have English as an additional language (EAL)
- ❖ Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- ❖ Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- ❖ Are asylum seekers
- ❖ Are at risk due to either their own or a family member's mental health needs
- ❖ Are looked after or previously looked after (see section 12)
- ❖ Are missing or absent from education for prolonged periods and/or frequently
- ❖ Whose parent/carer has expressed an intention to remove them from school to be home educated

All staff should be aware of the language used when talking to the pupil involved.

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

'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms, but staff should think carefully about what terminology you use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. Each case should be considered on an individual, case by case basis.

## 5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- ❖ Behaviour policy
- ❖ Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- ❖ Healthy and respectful relationships
- ❖ Boundaries and consent





- ❖ Stereotyping, prejudice and equality
- ❖ Body confidence and self-esteem
- ❖ How to recognise an abusive relationship (including coercive and controlling behaviour)
- ❖ The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- ❖ What constitutes sexual harassment and sexual violence and why they're always unacceptable

## 5.1 All staff

Staff who work directly (or indirectly) with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues).

### Staff code of conduct:

All staff, volunteers, and representatives must:

- ❖ Treat all children with respect and dignity.
- ❖ Avoid one-on-one situations in closed environments without visibility.
- ❖ Not engage in physical punishment or inappropriate touching.
- ❖ Not provide personal gifts or communicate privately with children through unapproved channels.
- ❖ Use age-appropriate language and behavior.
- ❖ Immediately report any breaches or concerns to designated officers.

### All staff will:

- ❖ Know when to share information with other practitioners and what action to take to support early identification and assessment
- ❖ Be able to identify and recognise all forms of abuse, neglect and exploitation
- ❖ Understand domestic abuse, including controlling and coercive behaviour as well as parental conflict that is frequent, intense and unresolved
- ❖ Be aware of new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- ❖ Be aware that a child and their family may be experiencing multiple needs at the same time
- ❖ Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- ❖ Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- ❖ Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- ❖ Provide a safe space for pupils who are LGBTQ+ and gender questioning to speak out and share their concerns





All staff will be aware of:

- ❖ Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behavior policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, Online Safety Policy and the safeguarding response to children who go missing from education/who are absent from education. The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- ❖ The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- ❖ What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- ❖ The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- ❖ New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- ❖ The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- ❖ The fact that children can be at risk of harm inside and outside of their home, at school and online
- ❖ The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- ❖ That a child and their family may be experiencing multiple needs at the same time
- ❖ What to look for to identify children who need help or protection

## 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our Lead DSL is Joanna Curley. The DSL takes lead responsibility for child protection and wider safeguarding, our deputy DSL is Executive Head teacher, Alison Neal, Head teacher Graham Richards, SENCO Ruth Palmer and Teacher Tegan McGill. In the unlikely event of all 5 of the DSL's being off site Dan McKay, mental health and wellbeing lead can offer advice and guidance to the school team.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Joanna Curley can be contacted on [joanna.curely@littleacornstc.com](mailto:joanna.curely@littleacornstc.com) or by phone 01233850422, ext 212 if she is not in the classroom or in the office.

Alison Neal can be contacted by email [alison.neal@littleacornstc.com](mailto:alison.neal@littleacornstc.com) or by phone 01233850422 if she is not in the classroom or in the office.





Graham Richards can be contacted by email [Graham.richards@littleacornstc.com](mailto:Graham.richards@littleacornstc.com) or by phone 01233850422, ext 208 if she is not in the classroom or in the office.

Ruth Palmer can be contacted by email [ruth.palmer@littleacornstc.com](mailto:ruth.palmer@littleacornstc.com) or by phone 01233850422, ext 213 if she is not in the classroom or in the office.

Tegan McGill can be contacted by email [Tegan.mcgill@littleacornstc.com](mailto:Tegan.mcgill@littleacornstc.com) or by phone 01233850422, ext 203 if she is not in the classroom or in the office.

The DSL will be given the time, funding, training, resources and support to:

- ❖ Provide advice and support to other staff on child welfare and child protection matters
- ❖ Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- ❖ Contribute to the assessment of children
- ❖ Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- ❖ The DSL will liaise with the assigned Social Worker for each child and parents where appropriate
- ❖ The full responsibilities of the DSL are set out in their job description
- ❖ The DSL will ensure children have an 'appropriate adult'
- ❖ The DSL will ensure online safety, including filtering and monitoring processes are in place

The DSL will also:

- ❖ Keep the headteacher informed of any issues
- ❖ Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- ❖ Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- ❖ Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- ❖ Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- ❖ Work alongside local authority and children services where absence indicates a safeguarding concern
- ❖ The full responsibilities of the DSL and deputies are set out in their job description.

The responsibility for decision making over issues of child protection lies with Kent County Council, the local authority for the area we are based. Little Acorns has developed links with the KSCMP and will ensure that our Safeguarding and Child Protection procedures are in accordance with both Kent Safeguarding Children procedures and the children's responsible/placing authority procedures. These will be available on site. See contact details below.

Little Acorns recognizes that successful outcomes for children depend on strong multi-agency partnership working across the whole system of help, support and protection including effective work from all agencies with parents, carers, and families. This includes principles for working with parents and carers to centre the importance of building positive, trusting, and co-operative relationships to deliver tailored support to





families, and expectations for multi-agency working that apply to all individuals, agencies and organisations working with children and their families, across a range of roles and activities.

Play a part in preventing abuse by discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's or college's policies (especially the child protection policy) and responses, and be confident that they know what local specialist support is available to support all children involved (victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

### 5.3 The governing board

#### The governing board will:

- ❖ Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- ❖ Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- ❖ Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- ❖ Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- ❖ Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training Reviewing the [DfE's filtering and monitoring standards](#), and ensure these are being actioned.
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

#### Make sure:

- ❖ The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- ❖ Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- ❖ The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- ❖ The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Please see separate Low-Level Concern Policy.
- ❖ That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- ❖ The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate
- ❖ All governors will read Keeping Children Safe in Education in its entirety.





- ❖ Section 15 of this policy has information on how governors are supported to fulfil their role.

## 5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

- ❖ Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- ❖ Communicating this policy to parents when their child joins the school and via the school website
- ❖ Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ❖ Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- ❖ Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- ❖ To make sure that online safety training is included in staff safeguarding and child protection training
- ❖ Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

## 5.5 Virtual school heads

- ❖ Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.
- ❖ VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).
- ❖ They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

## 5.6 Alternative Provision (AP) and Therapies

Schools should always know where a child is based during school hours. This includes maintaining records of the address of the AP, therapists and any sub-contracted provision or satellite sites the child might attend

Schools should regularly review AP placements, at least half-termly, in order to provide assurance that:

- ❖ The child is regularly attending
- ❖ The placement continues to be safe and meets the child's needs

Where safeguarding concerns arise, the placement should be immediately reviewed and terminated if necessary, unless or until those concerns have been satisfactorily addressed

## 6. Confidentiality

Confidentiality and Information Sharing Information sharing is vital to safeguarding and promoting the welfare of children and young people. A key factor identified in many serious case reviews (SCRs) has been a failure by practitioners to record information, to share it to understand its significance and then take appropriate action. Everyone who comes into contact with children and carers/families has a role to





play in identifying concerns, sharing information and taking prompt action. All matters relating to Safeguarding are confidential and every effort should be made to maintain confidentiality. However staff must be aware that they have a professional responsibility to share concerns and information with the Designated Lead for Safeguarding (DSL) and other professionals investigating a concern. All staff must be aware that they cannot promise a child or young person that they can keep secrets or promise confidentiality to staff or parents where a child or young person's safety is at risk. All staff have an overriding duty to report to the Designated Lead for Safeguarding any incident in which they judge the safety or wellbeing of a child or young person to have been at risk.

In summary:

- ❖ Timely information sharing is essential to effective safeguarding
- ❖ Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- ❖ The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- ❖ If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- ❖ Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- ❖ If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- ❖ Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved





- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- ❖ The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- ❖ If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- ❖ Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- ❖ Has a disability
- ❖ Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- ❖ Is a young carer
- ❖ Is bereaved
- ❖ Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- ❖ Is frequently missing/goes missing from education, care or home
- ❖ Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- ❖ Is at risk of being radicalised or exploited
- ❖ Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- ❖ Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- ❖ Is misusing drugs or alcohol
- ❖ Is suffering from mental ill health
- ❖ Has returned home to their family from care
- ❖ Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- ❖ Is a privately fostered child
- ❖ Has a parent or carer in custody or is affected by parental offending
- ❖ Is missing education, or persistently absent from school, or not in receipt of full-time education
- ❖ Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral, but the DSL should be notified as soon as possible.

- ❖ Consider whether the child is at immediate risk of harm: are they safe to go home?





- ❖ If a child is at risk of immediate harm, call the Integrated Front Door on 03000 411 111 (outside office hours - 03000 419 191) or the Police on 999
- ❖ Access the Kent Safeguarding Support Level Guidance document and procedures: [www.kscmp.org.uk](http://www.kscmp.org.uk)
- ❖ Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Police, or make a Request for Support via Integrated Children's Services: 03000 411 111
- ❖ If unsure, consult with Area Education Safeguarding Advisor (03301 65 13 40 West Kent) or Local Authority Social Worker at the Front Door: [www.kscmp.org.uk](http://www.kscmp.org.uk)

## 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- ❖ Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- ❖ Stay calm and do not show that you are shocked or upset
- ❖ Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- ❖ Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- ❖ Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- ❖ Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- ❖ Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- ❖ Not recognise their experiences as harmful
- ❖ Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- ❖ None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

## 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

- ❖ Is informed by a girl under 18 that an act of FGM has been carried out on her; or





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

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

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

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

### 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible. Children at Little Acorns School already have assigned Social Workers and so they will be contacted.

### Early Help Assessment

If Early Help Assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help Assessment, in some cases acting as the lead practitioner.

Early help strengthens the role of education and childcare settings in supporting children and keeping them safe, including information on a child's right to education and risk factors for practitioners to consider when identifying children and families who may benefit from early help. The approach to working with families has been strengthened throughout the guidance, outlining the role of family networks, including stronger guidance on the use of family group conferences to improve family network engagement in decision making and supporting children.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

### Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.





The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

All referrals can be completed through Kent Integrated Children services Portal: [Kent Children's Portal](#)

## 7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the management team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The guidance clarifies that you may share the personal data of someone susceptible to radicalisation without consent, if you have a lawful basis for doing so, UK GDPR does not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

## 7.6 If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree on a course of action.

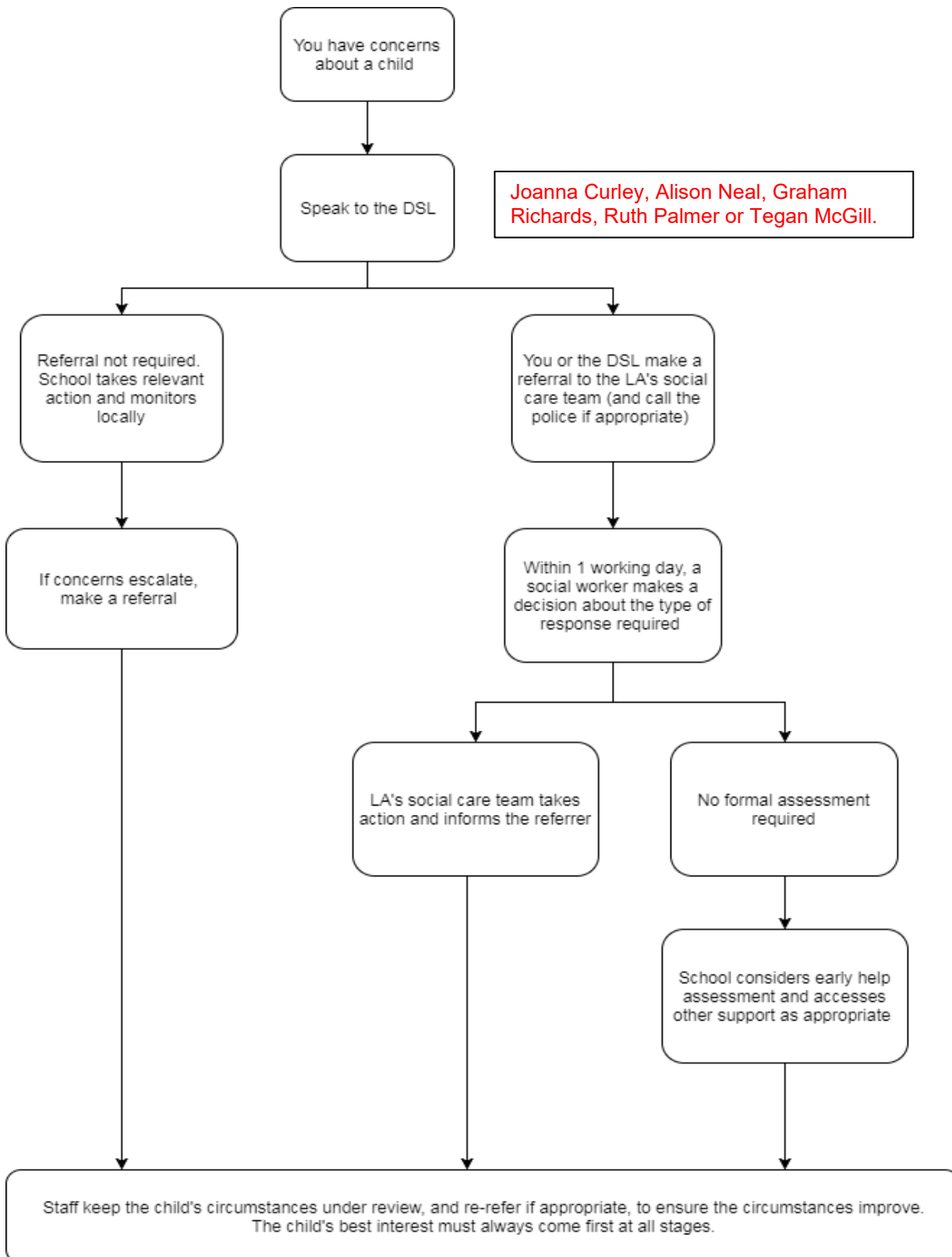
In the case of children under CAHMS they may be contacted to help with support.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.



Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## 7.7 Concerns about a staff member, supply teacher, volunteer, therapist or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher Graham Richards as soon as possible. If the concerns/allegations are about the headteacher, speak to Jawad Sheikh, chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Please read the Allegation Management Policy for more information.

## 7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

- ❖ All child-on-child abuse is unacceptable and will be taken seriously.
- ❖ Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
  - ❖ Is serious, and potentially a criminal offence
  - ❖ Could put pupils in the school at risk
  - ❖ Is violent
  - ❖ Involves pupils being forced to use drugs or alcohol
  - ❖ Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Children who are at risk or have suffered from sexual abuse or harassment will be directed to Lucy Faithfull Foundation’s [‘Shore Space’](#), a confidential chat service for young people concerned about their own, or someone else’s sexual thoughts and behaviours.

### Procedures for dealing with allegations of child-on-child abuse

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

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





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

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

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

To achieve this, we will:

- ❖ Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- ❖ Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- ❖ Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ❖ Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- ❖ Ensure staff reassure victims that they are being taken seriously
- ❖ Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- ❖ Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- ❖ Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy





- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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

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

## 7.9 Sharing of nudes and semi-nudes ('sexting')

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

### Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- ❖ Whether there is an immediate risk to pupil(s)
- ❖ If a referral needs to be made to the police and/or children's social care





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

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

- ❖ The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- ❖ There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- ❖ What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- ❖ The imagery involves sexual acts and any pupil in the images or videos is under 13
- ❖ The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

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

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

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

### **Informing parents/carers**

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

### **Referring to the police**

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

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.





## Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

Teaching follows best practice in delivering safe and effective education, including:

- ❖ Putting safeguarding first
- ❖ Approaching from the perspective of the child
- ❖ Promoting dialogue and understanding
- ❖ Empowering and enabling children and young people
- ❖ Never frightening or scare-mongering
- ❖ Challenging victim-blaming attitudes

## 7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

- ❖ Put systems in place for pupils to confidently report abuse
- ❖ Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- ❖ Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- ❖ Child to report concern to the DSL: Joanna Curley
- ❖ Children will be informed through discussion in your relationships/sex education curriculum and posters directing them to speak to Joanna Curley or any trusted adult.
- ❖ Reassurances provided following disclosures





## 8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- ❖ Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- ❖ Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- ❖ Set clear guidelines for the use of mobile phones for the whole school community
- ❖ Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### 8.1 The 4 key categories of risk

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

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

Educate pupils about online safety as part of our curriculum. For example:

- ❖ The safe use of social media, the internet and technology
- ❖ Keeping personal information private
- ❖ How to recognise unacceptable behaviour online
- ❖ How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- ❖ Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- ❖ Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- ❖ Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:





- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Staff can take mobile phones when out and about in the community to be able to call school for assistance
- ❖ Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- ❖ Children are not allowed to access their mobile devices during school time and any brought into school must be locked away in a cupboard or kept in the office
- ❖ Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- ❖ Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- ❖ Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Filtering and monitoring requirements also apply to your use of generative AI – see section 8.1 below
- ❖ Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- ❖ Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- ❖ Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website.

## 8.2 Artificial intelligence (AI)

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

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

Generative AI takes a written prompt and runs it through an algorithm to generate new, 'natural'-seeming content. Tools include:

- ❖ Chatbots such as ChatGPT, Google Gemini and GrammarlyGO, which generate text
- ❖ Text-to-image programs like DALL-E and Midjourney, which create images
- ❖ AI is a tool that can impact other safeguarding issues, like child sexual exploitation and sextortion





- ❖ Rather than being its own issue with its own signs to spot, staff should be aware of how AI might be used in other safeguarding concerns (e.g. cyber-bullying or sextortion)
- ❖ AI can also be used by other children to facilitate child-on-child abuse

Little Acorns School will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-bullying and behaviour Policies.

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

## 9. Notifying parents

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

## 10. Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- ❖ Assumptions, what indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- ❖ Pupils being more prone to peer group isolation than other pupils
- ❖ The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- ❖ Communication barriers and difficulties in overcoming these barriers
- ❖ Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so



## 11. Pupils with a social worker

Some pupils at Little Acorns School have an allocated Social Worker and are looked after in Little Acorns Therapeutic Care Home. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

The DSL will always consider the fact all children have social workers to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

Children's social workers will be notified of any new safeguarding concerns and any new disclosures the children may make about the trauma they suffered before coming to Little Acorns.

*As with all children at Little Acorns School, whether it be child-on-child, allegations against staff, disclosures about things happening at home all children will be taken seriously, supported and kept safe; they must never be made to feel they are causing problems by reporting abuse, sexual violence or sexual harassment.*

## 12. Looked-after and previously looked-after children

A high proportion of children at Little Acorns are looked-after therefore it is important that:

- ❖ staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
- ❖ Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- ❖ The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Ruth Palmer, SENCO who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

- ❖ The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- ❖ Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- ❖ Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 13. Pupils who are lesbian, gay, bisexual or gender questioning





We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## 14. Complaints and concerns about school safeguarding policies

### 14.1 Complaints against staff

Please see [Concerns and Complaints policy.docx](#) on our website.

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff see Allegation Management Policy on our website.

### 14.2 Allegations against Staff members

See separate [Handling Allegations.docx - Google Docs](#) policy.

### 14.3 Whistle-blowing

See separate [Whistleblowing Policy 2023.docx](#)

## 15. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded using CPOMS Safeguarding program. If the internet is not working, or you are not able to access this for any reason Green Concerns can be found on the Safeguarding Board in the staff room, both need to be alerted to Joanna Curley, Alison Neal, Graha Richards, Ruth Palmer or Tegan McGill.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Graham Richards and Joanna Curley holds the key to the locked Safeguarding filing cabinet which is Bonsai Office





(locked room) for historical concerns (pre Jan 2021) and both holds administration for the CPOMS online records.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school, if they have been transferred to a new school these will be transferred within 5 days of the child starting their new school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Green paper 'Concern Forms' can be found in the staff room on the Safeguarding Board, however these are only to be used when the internet is not working. They will then be transferred onto the CPOMS programme and the green forms shredded and disposed off safely. These will be retained until the child moves onto their next educational setting, whereby these will be securely and safely forwarded to the child's new educational provision. Joanna Curley offers training to all staff members to ensure these are completed correctly. Where appropriate and necessary these may be forwarded via secure email to the child's social worker.

Anonymous reporting options are available and encouraged.

It is also important to keep records to keep a chronology of each child but also to help if/when the DSL needs to respond to concerns or complaints about how a safeguarding case was handled.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 16. Training

### 16.1 All staff

Mandatory child protection training will be conducted annually for all staff, volunteers, and contractors. Training includes scenario-based workshops to identify complex abuse indicators.

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. All staff members receive electronic copies of the policies and these are updated as and when the policies are updated. This training will be regularly updated via staff meetings/ inset days/ formal training events and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. All staff members at Little Acorns School will complete an e-learning course as part of their induction.

Staff will also complete online training for online safety, FGM, CSE and other necessary safeguarding issue as they rise either nationally or locally.





Online Safety training for all staff should include online safety, including an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

## 16.2 The DSL

The DSL will undertake child protection and safeguarding training at least every 2 years. They will also complete the Advanced DSL training.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training/Online Safety Training.

## 16.3 Governors

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

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

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

## 16.4 Recruitment – interview panels

Little Acorns School adopts a culture of safe recruitment in our best attempt to deter, reject or identify people who may abuse children. The school pays full regard to current Dfe guidance 'Safeguarding Children and Safer Recruitment in Education' September 2016 and 'Keeping Children Safe in Education 2025). We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult including e.g. volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. These checks include any repeated concerns or allegations that have all been found to be false, unfounded, unsubstantiated or malicious in a reference. It also includes undertaking interviews and, where appropriate, undertaking List 99 and Criminal Records Bureau checks.

In line with statutory changes, underpinned by regulations, the following will apply:

- ❖ a DBS Enhanced Disclosure is obtained for all new appointments to our school's workforce through staffing personnel and payroll including (but not exclusive to) ID checks, prohibition from teaching check and a section 128 check where applicable.
- ❖ this school is committed to keep an up-to-date single central record detailing a range of checks carried out on our staff and details of safeguarding training completed





- ❖ all new appointments to our school workforce who have lived outside the UK will be subject to additional checks as appropriate
- ❖ our school ensures that supply staff have undergone the necessary checks and will be made aware of this policy
- ❖ the school will carry out online searches on shortlisted candidates to help identify any issues that are publicly available online.
- ❖ identity checks must be carried out on all appointments to our school workforce before the appointment is made, in partnership with the LA
- ❖ additionally teaching staff appointed will need extra checks to ensure they are not prohibited from teaching.
- ❖ Recruitment interviews will include child safeguarding-specific questions.
- ❖ Probationary periods will include safeguarding performance evaluations.

Appendix 2 details further our Safer Recruitment Policy

## 17. Monitoring arrangements

- ❖ This policy will be reviewed annually by Joanna Curley (DSL/Deputy Head Teacher) At every review, it will be approved by the full governing board.
- ❖ Feedback from children and communities will be regularly solicited.
- ❖ All incidents and learnings will inform policy revisions.

## 18. Links with other policies

This policy links to the following policies and procedures:

Behaviour

Staff behaviour

Positive Handling

Complaints

Health and safety

Attendance

Online safety

Equality

First aid

Curriculum

Privacy notices

Whistle blowing policy

RSE Policy

Low Level Concern Policy

Designated teacher for looked-after and previously looked-after children





## Appendix 1: recognition of and types of abuse

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday. Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse and Neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or 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 a stranger. They may be abused by an adult or adults or another child or children.

### Recognition of possible abuse:

It is extremely difficult to determine if abuse has occurred. Teachers and Care Staff within the Home and School at Little Acorns should look carefully at the behaviour of the Children and be alert for significant changes. All staff should be aware that Children may exhibit any of the following without abuse having occurred:

- ❖ Disclosure.
- ❖ Non-accidental injury, bruising or marks.
- ❖ Explanation inconsistent with injury.
- ❖ Several different explanations for an injury.
- ❖ Reluctance to give information about an injury.
- ❖ A sudden change in behaviour – aggression, extroversion, depression, withdrawn.
- ❖ Attention seeking.
- ❖ Hyperactivity.
- ❖ Poor attention.
- ❖ Appear frightened of specific people.
- ❖ Abnormal attachment between the Child and specific person(s).
- ❖ Indiscriminate attachment.
- ❖ Hyper alertness.
- ❖ Reduced response.
- ❖ Frozen watchfulness.
- ❖ Nightmares.
- ❖ Anxiety / Irritability.
- ❖ Abdominal pain / Headaches.
- ❖ Poor Self Esteem.
- ❖ Poor peer relationships.
- ❖ Act in an inappropriate way for their age.
- ❖ Over sexualised play, talk or drawings.
- ❖ Excessive or inappropriate masturbation.
- ❖ Self-harm / Eating disorder.
- ❖ Reluctance to get changed or wash / bathe.





(Recognition–Risk Indicators)

Please see the Kent Child Protection Procedures for further information and guidance.

There are a number of ways in which staff may become aware that a child is either being abused or is at risk of being abused:

- ❖ Observation: Through direct observation of symptoms and signs of abuse and neglect, and also changes in behaviour.
- ❖ Allegations: As a consequence of allegations or a report being made by a child or another person.
- ❖ Disclosure: Either directly from a child or by someone who says they are harming a child.

It is not the responsibility of Little Acorns staff to determine whether or not abuse has taken place. It is their responsibility to be alert to possible signs and symptoms of abuse and to report any concerns about the welfare of a child, whether arising from abuse or from poor/unsafe care practices within the home.

In considering the behaviour, attitudes and practices of their colleagues, the guiding principle for all staff must be to discuss immediately with the manager or one of the directors anything that causes them to feel uncomfortable.

Working Together 2018 places an emphasis on early identification and intervention of vulnerable children. It is the responsibility of Little Acorns employees to be aware of potential risk factors and safeguarding concerns and to report and mediate accordingly.

The sustained abuse or neglect of children and young people, physically, emotionally or sexually can have a major and long-term effect on all aspects of the child/young person's health, development and well-being. Any suspected or potential abusive incident has to be viewed in context to assess the extent of harm to each young person and explore the appropriate intervention. Often, it is the interaction between a number of factors which serves to increase the likelihood or level of actual significant harm

### Types of 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.

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

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





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

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

The following lists are neither definitive nor exhaustive. The information has to be used in context with a range of other information related to a child's circumstances. Signs of possible abuse:

### Physical Abuse

- ❖ Unexplained injuries or burns, particularly if they are recurrent
- ❖ Improbable excuses given to explain injuries
- ❖ Refusal to discuss injuries
- ❖ Untreated injuries or delay in reporting them
- ❖ Excessive physical punishment
- ❖ Arms and legs kept covered in hot weather
- ❖ Fear of returning home
- ❖ Aggression towards others
- ❖ Running away

When considering the possibility of non-accidental injuries, remember that injuries may have occurred for other reasons e.g. genuine accidents or medical disorders.

### Physical Neglect

- ❖ Constant hunger
- ❖ Poor personal hygiene
- ❖ Constant tiredness
- ❖ Poor state of clothing
- ❖ Frequent lateness, or unexplained non-attendance at school
- ❖ Untreated medical problems
- ❖ Low self-esteem





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- ❖ Poor peer relationships
- ❖ Stealing
- ❖ Neglect may occur during pregnancy as a result of substance abuse

### Emotional Abuse

- ❖ Low self-esteem
- ❖ Continual self-deprecation
- ❖ Sudden speech disorder
- ❖ Significant decline in concentration
- ❖ Socio-emotional immaturity
- ❖ "Neurotic" behaviour (e.g. rocking, head banging)
- ❖ Self mutilation
- ❖ Compulsive stealing
- ❖ Extremes of passivity or aggression
- ❖ Running away
- ❖ Indiscriminate friendliness





## Sexual Abuse

Not all children are able to tell, or are believed by parents. Changes in behaviour may be a signal that something has happened. It is important to remember that there may well be no physical or behavioural signs. The following indicators may show that a child is troubled, but not through sexual abuse. The child may have some of these signs or none at all. It is a combination, frequency and duration of signs that can alert you to a problem.

### Behavioural:

- ❖ Lack of trust in adults, or over familiarity with adults
- ❖ Fear of a particular individual
- ❖ Social isolation – withdrawal or introversion
- ❖ Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone, needing a nightlight)
- ❖ Running away
- ❖ Reluctance or refusal to participate in physical activity or to change clothes for activities
- ❖ Low self-esteem
- ❖ Drug, alcohol or solvent abuse
- ❖ Display of sexual knowledge beyond their years
- ❖ Unusual interest in the genitals of adults, children or animals
- ❖ Expressing affection in an inappropriate way
- ❖ Fear of bathrooms, showers, closed doors
- ❖ Abnormal, sexualised drawing
- ❖ Fear of medical examinations
- ❖ Developmental regression
- ❖ Poor peer relations
- ❖ Over-sexualised behaviour/sexual promiscuity
- ❖ Stealing
- ❖ Psychosomatic factors e.g. recurrent abdominal pains or headache

### Physical:

- ❖ Sleeplessness, fear of the dark, nightmares
- ❖ Bruises, scratches, bite marks to the thighs or genital area
- ❖ Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- ❖ Pain on passing urine or recurrent urinary infection
- ❖ Stained underwear
- ❖ Unusual genital odour





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- ❖ Anxiety, depression
- ❖ Eating disorder e.g. anorexia or bulimia
- ❖ Discomfort/difficulty in walking/sitting
- ❖ Venereal disease
- ❖ Soiling or wetting in children who have been trained
- ❖ Self mutilation/suicide attempts





## Appendix 2: safer recruitment and DBS checks – policy and procedures

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

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

### Advertising

When advertising roles, we will make clear:

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

### Application forms

Our application forms will:

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

### Shortlisting

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

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

Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process

- ❖ Once we have shortlisted candidates, we will ask shortlisted candidates to:
  - ❖ Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage.
- 
- ❖ The information we may ask for includes:





- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- If they are known to the policy and children's local authority social care and
- If they have been disqualified from providing childcare

❖ Sign a declaration confirming the information they have provided is true

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

### Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

#### When seeking references we will:

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

### Interview and selection

#### When interviewing candidates, we will:

- ❖ Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- ❖ Explore any potential areas of concern to determine the candidate's suitability to work with children
- ❖ Record all information considered and decisions made
- ❖ Pre-appointment vetting checks





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

### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

#### When appointing new staff, we will:

- ❖ Verify their identity
- ❖ [Check a teacher's record](#) replaces the TRA's Teacher Employer Access service
- ❖ [Individuals prohibited from managing or governing schools](#) replaces the TRA's Employer Secure Access portal
- ❖ Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- ❖ Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- ❖ Verify their mental and physical fitness to carry out their work responsibilities
- ❖ Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- ❖ Verify their professional qualifications, as appropriate
- ❖ Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

For all staff, including teaching positions: [criminal records checks for overseas applicants](#)

For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we





will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- ❖ Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- ❖ Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- ❖ Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- ❖ There are concerns about an existing member of staff's suitability to work with children; or
- ❖ An individual moves from a post that is not regulated activity to one that is; or
- ❖ There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

### Agency and third-party staff

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

### Contractors

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

This will be:





- ❖ An enhanced DBS check with barred list information for contractors engaging in regulated activity
- ❖ An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- ❖ We will obtain the DBS check for self-employed contractors.
- ❖ We will not keep copies of such checks for longer than 6 months.
- ❖ Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- ❖ We will check the identity of all contractors and their staff on arrival at the school.
- ❖ For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## Volunteers

### We will:

- ❖ Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- ❖ Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- ❖ Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- ❖ Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## Governors

All governors will have an enhanced DBS check without barred list information.

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

All proprietors, trustees, local governors and members will also have the following checks:

- ❖ A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- ❖ Identity
- ❖ Right to work in the UK
- ❖ Other checks deemed necessary if they have lived or worked outside the UK





## Appendix 3: allegations of abuse made against staff

### Allegations that may meet the harm threshold

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

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

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

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

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

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

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

### Suspension of the accused until the case is resolved

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

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

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

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

### Definitions for outcomes of allegation investigations

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





- ❖ **False:** there is sufficient evidence to disprove the allegation
- ❖ **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- ❖ **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

## Procedure for dealing with allegations

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

- ❖ Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- ❖ Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- ❖ Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- ❖ Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- ❖ Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- ❖ If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- ❖ If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- ❖ If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- ❖ Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Direct the individual to seek support from the Mental Health Leader, to contact their trade union and to utilise the services of Health Assured.





- ❖ Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- ❖ Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- ❖ Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

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

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

## Timescales

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

- ❖ Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- ❖ If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- ❖ If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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





## Specific actions

### Action following a criminal investigation or prosecution:

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

### Conclusion of a case where the allegation is **substantiated**:

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

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

### Individuals returning to work after suspension:

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

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

### Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

## Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

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

## Record-keeping

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

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





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

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

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

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

## References

### When providing employer references, we will:

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

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

### Links to LADO:

Link to refer an adult to LADO:

[Kent Children's Portal](#)

Enquiries Form when seeking advice whether an allegation has met the threshold of harm:

[LADO Education Safeguarding Advisory Service \(LESAS\) Enquiry Form](#)





## Concerns that do not meet the harm threshold

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

### Concerns may arise through, for example:

- ❖ Suspicion
- ❖ Complaint
- ❖ Safeguarding concern or allegation from another member of staff
- ❖ Allegation made by child during crisis or physical intervention
- ❖ Disclosure made by a child, parent or other adult within or outside the school
- ❖ Pre-employment vetting checks

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

### Little Acorns Allegation Protocol:

An allegation will be deemed as not meeting the threshold of harm by the Headteacher or Designated Safeguarding Lead (DSL) after conducting initial inquiries in accordance with the school's established procedures to establish the facts. This decision may be made when one or more of the following conditions apply:

Multiple witnesses provide statements that counter the allegation.

- ❖ The staff member has adhered to PRICE procedures and risk assessments accurately.
- ❖ All relevant school policies and procedures have been followed appropriately.
- ❖ The child has an established allegation management procedure, which will be followed in the first instance.
- ❖ The allegation has been retracted by the individual making it.
- ❖ The allegation is not repeated when the individual is re-questioned.
- ❖ An allegation is not linked to abuse, then the low-level concerns policy will be followed.
- ❖ The allegation relates to an incident already being investigated by an external agency or already been found to be unsubstantiated, false or malicious.

All allegations will be communicated to the child's parents or carers, as well as the relevant social workers.

If a child has made multiple allegations (3 or more) which are not meeting the 'threshold of harm' then an allegation protocol will be created to safeguard the child and staff working with them.





## Appendix 4: specific safeguarding issues

Bullying Most cases of bullying will be dealt with effectively via our anti- bullying policy set out in a separate document. There may, however, be circumstances when a referral will be required, in accordance with the procedure detailed below. For example, when bullying involves criminal behaviour, or when initial steps to combat it effectively have been unsuccessful.

Knowingly allowing, or condoning, bullying may lead to consideration under child protection procedures as this could constitute a 'failure to act to prevent harm'.

Bullying can take different forms. It could include:

- ❖ physical bullying: hitting, slapping or pushing someone
- ❖ verbal bullying: name calling, gossiping or threatening someone
- ❖ non-verbal abuse: hand signs or text messages
- ❖ emotional abuse: threatening, intimidating or humiliating someone
- ❖ exclusion: ignoring or isolating someone
- ❖ undermining, constant criticism or spreading rumours
- ❖ controlling or manipulating someone
- ❖ making silent, hoax or abusive calls
- ❖ racial, sexual or homophobic bullying
- ❖ bullying someone because they have a disability

### Children who are absent from education

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

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

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

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

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





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

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- ❖ Appearing with unexplained gifts or new possessions
- ❖ Associating with other young people involved in exploitation
- ❖ Suffering from changes in emotional wellbeing
- ❖ Misusing drugs and alcohol
- ❖ Going missing for periods of time or regularly coming home late
- ❖ Regularly missing school or education
- ❖ Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

Having an older boyfriend or girlfriend





Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## Serious Violence

There are a variety of indicators which may signal 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 and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

## Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. Domestic Abuse can include ill treatment that is not physical, as well as witnessing ill treatment of others.

Extra- familial harms can include sexual harrassment and domestic abuse within their own intimate relationships (teenage).

Most the children a Little Acorns School have witnessed or been victim of Domestic Violence and all staff need to be sensitive to this. They also need to carry the 'it could happen here' approach when the children return home to the Therapeutic Care Home that is part of the Little Acorns Therapeutic Community.

Children who are exposed to and witness domestic abuse are also victims. Domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. Children can also be perpetrators of domestic abuse in there own relationships.

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

## Parental Conflict at home

Some level of conflict between parents is often a normal part of everyday life, it becomes a safeguarding concern when the conflict is frequent, intense, poorly resolved or damaging. This can include unresolved arguing, silence, lack of respect or lack of resolution. This conflict can affect children in all types of parental relationships.

Conflict in itself is not a safeguarding concern, but conflict that is frequent, intense, poorly resolved or damaging can be, as it can have a significant negative impact on children's mental health and long-term life chances

Staff may hear about parental conflict:

- ❖ Directly from a child
- ❖ Through a child's work, such as written work in English





- ❖ Through a child's actions during play
- ❖ From parents during parents' evening or other meetings

Parental conflict at home can lead to other behaviours in school – for example, a child could be more withdrawn or angrier. Parental conflict in general is not a safeguarding concern, but can be a warning sign if it becomes frequent or intense.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

## So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### FGM

FGM is when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting', but has many other names.

You might have heard female genital mutilation (FGM) be called a different name. Some common names for FGM include:

- ❖ female circumcision
- ❖ cutting
- ❖ sunna
- ❖ gudniin
- ❖ halalays
- ❖ tahur
- ❖ megrez
- ❖ khitan.

You might have heard some FGM terms that you're not familiar with, including:

### 'Cutter'

A 'cutter' is somebody who carries out FGM. They might use things like knives, scalpels, scissors, glass or razor blades to carry out the procedure.





'Cutting'

season'

This refers to the summer months – often July, August and September – when many girls are on break from school. This is often the period when girls have time to undergo FGM. Girls might be flown abroad during this time, so it's important to be aware of this risk.

FGM is a form of child abuse. It's dangerous and a criminal offence in the UK. We know:

- ❖ there are no medical reasons to carry out FGM
- ❖ it's often performed by someone with no medical training, using instruments such as knives, scalpels, scissors, glass or razor blades
- ❖ children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained
- ❖ it's used to control female sexuality and can cause long-lasting damage to physical and emotional health.

FGM can happen at different times in a girl or woman's life, including:

- ❖ when a baby is new-born
- ❖ during childhood or as a teenager
- ❖ just before marriage
- ❖ during pregnancy

Circumstances and occurrences that may point to FGM happening are:

- ❖ Child talking about getting ready for a special ceremony
- ❖ Family taking a long trip abroad
- ❖ Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- ❖ Knowledge that the child's sibling has undergone FGM
- ❖ Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- ❖ Prolonged absence from school and other activities
- ❖ Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- ❖ Bladder or menstrual problems
- ❖ Finding it difficult to sit still and looking uncomfortable
- ❖ Complaining about pain between the legs
- ❖ Mentioning something somebody did to them that they are not allowed to talk about
- ❖ Secretive behaviour, including isolating themselves from the group
- ❖ Reluctance to take part in physical activity
- ❖ Repeated urinal tract infection





## Mandatory Reporting of Female Genital Mutilation [FGM]:

In response to the Mandatory Reporting Duty which came into force on 31st October 2015, the following requirements;

- ❖ Where a professional, who is subject to the mandatory reporting duty, has either been told by a girl that she has had FGM or has observed a physical sign appearing to show that a girl has had FGM s/he should personally report the matter to the police by calling 101.
- ❖ In all other cases, professionals should follow normal safeguarding processes. This is in line with guidance produced by NHS England and the Metropolitan Police Service.

For further information please refer to the recently published Home Office statutory guidance '[Mandatory Reporting of Female Genital Mutilation](#)' and note 'Annex A – FGM mandatory reporting process map'.

## Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

### The DSL will:

- ❖ Speak to the pupil about the concerns in a secure and private place
- ❖ Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- ❖ Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- ❖ Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is 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 of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- ❖ Refusal to engage with, or becoming abusive to, peers who are different from themselves
- ❖ Becoming susceptible to conspiracy theories and feelings of persecution
- ❖ Changes in friendship groups and appearance
- ❖ Rejecting activities they used to enjoy
- ❖ Converting to a new religion
- ❖ Isolating themselves from family and friends
- ❖ Talking as if from a scripted speech
- ❖ An unwillingness or inability to discuss their views
- ❖ A sudden disrespectful attitude towards others
- ❖ Increased levels of anger
- ❖ Increased secretiveness, especially around internet use
- ❖ Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- ❖ Accessing extremist material online, including on Facebook or Twitter
- ❖ Possessing extremist literature
- ❖ Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

### Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. 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. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process.

## Grooming

Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.

Children and young people who are groomed can be [sexually abused](#), [exploited](#) or [trafficked](#).

Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

### *Types of grooming*

Children and young people can be groomed online, in person or both – by a stranger or someone they know. This could be a family member, a friend or someone who has targeted them – like a teacher, faith group leader or sports coach. When a child is groomed [online](#), groomers may hide who they are by sending photos or videos of other people. Sometimes this'll be of someone younger than them to gain the trust of a "peer". They might target one child online or contact lots of children very quickly and wait for them to respond.

The relationship a groomer builds can take different forms. This could be:

- ❖ a romantic relationship
- ❖ as a mentor
- ❖ an authority figure
- ❖ a dominant and persistent figure.

A groomer can use the same sites, games and apps as young people, spending time learning about a young person's interests and use this to build a relationship with them. Children can be groomed online through:

- ❖ social media networks
- ❖ text messages and messaging apps, like Whatsapp
- ❖ email
- ❖ text, voice and video chats in forums, games and apps.

Whether online or in person, groomers can use tactics like:

- ❖ pretending to be younger
- ❖ giving advice or showing understanding
- ❖ buying gifts
- ❖ giving attention
- ❖ taking them on trips, outings or holidays.





Groomers might also try and isolate children from their friends and family, making them feel dependent on them and giving the groomer power and control over them. They might use blackmail to make a child feel guilt and shame or introduce the idea of 'secrets' to control, frighten and intimidate.

It's important to remember that children and young people may not understand they've been groomed. They may have complicated feelings, like loyalty, admiration, love, as well as fear, distress and confusion.

### Child abduction and community safety incidents

Child abduction is when children are taken from their parents or carers without permission. It can be committed by parents or other family members, by people known but not related to the child (like neighbours, friends and acquaintances), and by strangers

- ❖ Community safety incidents are things like unknown adults loitering near school or trying to talk to children
- ❖ Always follow our pick-up procedures to make sure children only go home with their designated adult(s). For our children in taxi's we are to ensure that it is the regular driver, if due to unforeseen circumstances a different driver arrives we are to ensure ID is seen for the driver and the chaperone.
- ❖ If you see anything suspicious or that doesn't feel right, report it immediately

### Modern slavery

- ❖ This includes human trafficking and slavery, servitude and forced or compulsory labour
- ❖ The exploitation can take many forms, for example sexual exploitation, forced labour, forced criminality and the removal of organs
- ❖ There's a national referral mechanism for modern slavery – speak to your DSL if you need to know more about this

### Cybercrime:

- ❖ This is defined as criminal activity committed using computers and/or the internet
- ❖ This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), and creating and using malware such as viruses
- ❖ Children who are particularly skilled in computing and technology may be drawn into cybercrime – either deliberately or inadvertently

### Child-on-Child Sexual Harrassment and Sexual Violence

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. When dealing with concerns regarding HSB it is vital to consider the age and stage of the children, these are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

- ❖ At Little Acorns School there is a zero tolerance approach to sexual violence and sexual harassment, and that failure to do so can lead to a culture of unacceptable behaviour and in the worst case scenario, a culture that normalises abuse





- ❖ All staff are mindful that children in our SEND setting are 3 times more likely to be a victim to this and that just because there are no reports it does not mean it is not happening.
- ❖ staff will challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. This behaviour will not be 'normalised'.
- ❖ Staff to be mindful that many 'perpetrators' have suffered their own abuse and/or trauma and so should also be offered suitable support.
- ❖ Staff shouldn't promise confidentiality as it might be in the victim's best interest to seek advice and guidance
- ❖ If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, there's no definitive answer. This is because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- ❖ The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

#### The DSL should consider that:

- ❖ Parents or carers should normally be informed (unless this would put the victim at greater risk)
- ❖ The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- ❖ Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

#### Regarding anonymity, schools should:

- ❖ Be aware of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- ❖ Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report and any support for the children involved
- ❖ Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- ❖ Reassure all victims/perpetrators that the law is there to protect and support, not to criminalise children.

#### Discipline and the alleged perpetrator(s)

- ❖ The DSL should take the lead role
- ❖ You can take disciplinary action whilst other investigations are ongoing e.g. by the police
- ❖ The fact another body is investigating/has investigated an incident doesn't (in itself) prevent you from coming to your own conclusion about what happened and impose a penalty accordingly. This is a matter for you and you should consider it on a case-by-case basis
- ❖ You should consider whether:
- ❖ Taking action would prejudice an investigation and/or subsequent prosecution - liaise with the police and/or LA children's social care to determine this
- ❖ There are circumstances that make it unreasonable/irrational for you to reach your own view about what happened





- ❖ You can, and should, take disciplinary action and still provide support at the same time if necessary

### Working with parents and carers

- ❖ You will (in most cases) engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of sexual violence
- ❖ The exception is if there's reason to believe informing a parent or carer will put the child at additional risk
- ❖ You should think carefully about what information you provide about the other child involved, and when. Make sure you work with relevant agencies to ensure your approach to information sharing is consistent
- ❖ It's good practice to:
  - ❖ Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress
  - ❖ Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision
  - ❖ The DSL and Head Teacher at Little Acorns would attend these meetings - decide what other agencies should attend on a case-by-case basis. For our LAC Social Workers would be invited.

### Safeguarding other children

- ❖ You should consider supporting children who have witnessed sexual violence, especially rape and assault by penetration
- ❖ You should do all you can to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed
- ❖ Social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- ❖ You should consider school transport as part of your risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s)
- ❖ It's important to keep your policies, processes and curriculum constantly under review to protect all children

### Reports of sexual violence and/or harassment may:

- ❖ Point to environmental/systematic problems that could be addressed by updating policies, processes and the curriculum
- ❖ Reflect wider issues in the local area

If there are delays in the criminal process, it will be important for the DSL to work closely with the police (and other agencies as required) whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s) – this is to make sure the school's actions don't jeopardise the police investigation. If you have any questions about the investigation, you should contact the police.

When supporting the victim, Little Acorns School will:

- ❖ Regularly review decisions and actions, and update relevant policies with lessons learnt
- ❖ Look out for potential patterns of concerning, problematic or inappropriate behaviour, and where you identify a pattern, decide on a course of action
- ❖ Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether extra teaching time and/or staff training could minimise the risk of it happening again





Children who have experienced sexual violence can display a wide range of responses, so schools should remain alert to the possible challenges of detecting those signs and show sensitivity to their needs.

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge. Visitors onsite will be handed a Little Acorns Safeguarding leaflet on arrival once they have signed in at the office.

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

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

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

