

The Friary School

SAFEGUARDING POLICY



Introduction

The Friary School recognises its legal duty under 175 Education Act 2002 (section 157 in relation to independent schools and academies) and the 1989 and 2004 Children Acts. We take seriously our responsibilities to protect and safeguard the interests of all students. This organisation recognises that effective child protection work requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to child protection situations.

These procedures aim to provide a framework which ensures that all our practice in regard to safeguarding children is consistent with the stated values and procedures that underpin all work with children and young people.

This Policy has regard to the statutory guidance 'Working Together to Safeguard Children' 2018 and 'Keeping Children Safe in Education' 2018 (KCSIE). The Policy is in keeping with Staffordshire Safeguarding Children Board's (SSCB) policies and procedures and their training strategy and reflects what the SSCB considers to be safe and professional practice. Child protection has to be considered within professionals' wider "safeguarding" responsibilities that include a duty to co-operate under the Children Act 2004 and takes account of the need for children to 'be healthy' and 'stay safe'.

This document also seeks to make the professional responsibilities clear to all staff (teaching and non-teaching, including temporary and supply), governors and volunteers to ensure that statutory and other duties are met. All staff and volunteers need to have read and be familiar with this Policy, and our internal procedures around referral, including contact details of the Designated Safeguarding Leads (referred to as DSL(s) in subsequent paragraphs).

This Safeguarding Policy will be reviewed annually by the Governing Body.

Safeguarding and Promoting the Welfare of Children

The definition for Safeguarding and promoting the welfare of children in Working Together to Safeguard Children 2018 is:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcome

Underpinning Values

Where there is a safeguarding issue, the Friary School will work in accordance with the principles outlined in the Staffordshire Safeguarding Children Board Inter-agency child protection procedures:

A child's welfare is paramount. Each child has a right to be protected from harm and exploitation and to have their welfare safeguarded.

Each child is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs.

Children, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances.

Parents will be advised about the School Safeguarding Policy in the school prospectus and in the first newsletter of each year. A copy of the Policy is available on the school website.

Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare. However, it may not be appropriate to advise parents/carers immediately about a referral depending on circumstances and the advice given by Children's Social Care. The welfare of the child is paramount in such situations.

Each child has a right to be consulted about actions taken by others on his/her behalf in an age appropriate way. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings. However, it may not always be possible to respect a child/carers request for confidentiality. If a child may be at risk of significant harm, there is a duty on the school to share information with Children's Social Care. This will be explained to the child or family member and appropriate reassurance given.

Personal information is usually confidential. It should only be shared with the permission of the individual concerned (and/or those with parental responsibility) unless the disclosure of confidential personal information is necessary in order to protect a child or promote their welfare (see also section on confidentiality below). In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict "need to know" basis.

Professionals should be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do.

Explanations by professionals to children, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms.

Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation.

Providing early support is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children and enshrined in legislation and statutory guidance (Children's Act 2004, Working Together to Safeguard Children 2018, 'Keeping Children Safe in Education' 2018).

Thresholds for Intervention - Early Support - Early Help Assessment

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising; for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse.

Effective early help relies upon local organisations and agencies working together to:

- identify children and families who would benefit from early help
- undertake an assessment of the need for early help
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve the outcomes for the child

Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency co-operation to improve the welfare of all children.

Practitioners should be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)

- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- a privately fostered child

Practitioners should complete an Early Help Assessment (EHA) when:

- Age appropriate progress is not being made and the causes are unclear
- The support of more than one additional agency is needed to meet the child or young person's needs

All staff receive EHA awareness training. Staff should discuss children who appear to have additional needs with the Designated Safeguarding Lead (DSL), the child and parents. The school will need to obtain parental/student consent for an EHA to be completed. Students are able to give their own consent for an EHA in certain circumstances if they are old enough and competent to do so. The school DSL may need to make a referral directly to other agencies, or request the support of Staffordshire County Council Local Support Team (LST). Staff will follow the guidance of the SSCB Threshold Document - accessing the right help at the right time ([link](#) - procedure 1E). The school will always consider complete an 'Outcome Star' assessment in support of an EHA and this may prove to be sufficient in some cases.

Child in Need - S17 of the Children Act 1989

A 'Child in Need' referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required.

Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:

- Child(ren) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority
- Their health or development is likely to be impaired, or further impaired without the provision of such services
- They are disabled

If the DSL considers that the welfare concerns indicate that a 'Child in Need' referral is appropriate, he/she will speak with parents / young person and obtain their consent for referral to the First Response Team (FRT) or the appropriate social care team if a different authority, to request an assessment (although anyone with a concern about a child's welfare should make a referral to the Local Authority's Children / Social Care Team). If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss the issues with the FRT.

Appropriate school staff should be invited to participate in Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require section 17 services.

Some children in 'acute need' (see SSCB Threshold guidance) may require Child in Need. This could include children who self-harm or disclose an intent to commit suicide (SSCB procedure 4U).

Child Protection (S47 Children Act 1989)

S47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. Staff from this organisation do not investigate whether a child has been abused. This is the duty of Social workers from the Safeguarding team and the police. Education staff refer reasonable concerns which indicate that a child may be at risk of significant harm.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines the likelihood that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.

In order to understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development.

Indicators of Abuse & Neglect

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

If staff have significant concerns about any child they must make them known to the DSL or Deputy DSLs without delay in accordance with reporting and recording procedures.

A Child Protection Form (available in the staff room and from main office) must be completed in all cases and given to the DSL or to the Deputy DSLs in their absence. These concerns may include:

(i) Abuse:

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

(ii) Physical Abuse:

This 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 (*Working Together to Safeguard Children' 2015*).

(iii) Emotional Abuse:

This is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious

bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

(iv) Neglect:

This 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

(v) Sexual Abuse:

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

Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

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 should consider the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. 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. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Government guidance can be accessed as required on the issues listed below that have associated safeguarding guidance via GOV.UK and other government websites and in Keeping Children safe in Education 2018 although some are expanded upon beneath:

- Children Formerly Looked After
- Child Missing from Home or Care
- Children with SEND
- Drugs and Substance Misuse
- Faith Abuse
- Forced Marriage
- Gender-Based Violence (VAWG)
- Mental Health
- Private Fostering
- Children Missing Education (CME)
- Child Sexual Exploitation (CSE)
- Domestic Violence
- Fabricated or Induced Illness
- Female Genital Mutilation (FGM)
- Gangs & Youth Violence
- Hate
- Peer-on-Peer Abuse
- Preventing Radicalisation

- Sexting
- Trafficking

Peer-on-Peer Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals

Expected Action Taken by All Staff:

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved.

How Facts will be Gathered:

All the young people involved should be spoken to separately, so that a statement of facts can be obtained using consistent language and open questions for each account. Clarity can be sought with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

Risk Assessment:

Has this been a deliberate or contrived situation for a young person to be able to harm another?

The Next Course of Action:

If the information gathered indicates any young person is at risk of significant harm, then a safeguarding referral to social care should be considered (where a crime has been committed the police should be involved also).

If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take.

It may also be that social care feel that it does not meet their criteria and this may need to be challenged if required. If on discussion however, agreement is reached, parents may need to be informed next.

Informing Parents:

If, once appropriate advice has been sought from police/social care, there is agreement that parents should be informed this should be done with the support of the DSL or Deputy DSLs. If services are not going to be involved then equally, this information may need to be shared with parents. If a young person is deemed to be 'Gillick Competent' following the 'Fraser' guidelines and does not wish the information shared with parents, then the school must consider this although informing parents is the most likely course of action.

In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to agree to the information being shared with their parents (they may be scared to tell parents that they are being harmed in any way). Where school can evidence they are acting in the best interests of

the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the young person.

The best way to inform parents is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

Points to Consider:

The following points should be considered when analysing the respective case:

- What is the age of the children involved ?
- How old are the young people involved in the incident and is there any age difference between those involved ?
- Where did the incident or incidents take place ?
- Was the incident in an open, visible place to others ? If so was it observed ? If not, is more supervision required within this particular area ?
- What was the explanation by all children involved of what occurred ?
- Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved ?
- Is the incident seen to be bullying for example, in which case regular and repetitive ?
- Is the version of one young person different from another and why ?
- What is each of the children's own understanding of what occurred ?
- Do the young people know/understand what they are doing ? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch ?
- Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour ?
- Is the behaviour deliberate and contrived ?
- Does the young person have understanding of the impact of their behaviour on the other person ?

Repetition:

It is important to understand whether the behaviour has been repeated to an individual on more than one occasion.

In the same way it must be considered whether the behaviour has persisted by the individual after the issue has already been discussed or dealt with and appropriately resolved.

Further Information:

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

- For the young person who has been harmed:

It should be recognised that the support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer

groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

- For the young person who has displayed harmful behaviour:

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through an early help assessment and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that the young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others, in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved, including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

After Care:

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

Preventative Strategies:

For all schools and settings, it is important to develop appropriate strategies in order to prevent the issue of peer on peer abuse rather than manage the issues in a reactive way.

Firstly, and most importantly for schools and settings is recognition that peer on peer abuse can occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

This can be supported by ensuring that each school/setting has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through a strong and positive curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment it is necessary to ensure the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. In order to create such an environment, it is necessary for whole staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.

It is important that signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. The student support team are always available to discuss concerns with young people and they mentor students who are considered to be vulnerable in particular.

Finally having a school council and student voice and encouraging young people to support changes and develop 'rules of acceptable behaviour' will go far in helping to create a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive. The issue of peer on peer abuse will be focussed on from time to time in school council so that that can inform future policy updates.

E-Safety

The growth of different electronic media in everyday life and an ever developing variety of devices including PC's, tablets, laptops, mobile phones, webcams, gaming consoles etc. place an additional risk on our children.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arranging to meet them.

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with students/students at this school.

Students can engage in or be a target of cyberbullying using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture violent assaults of other children for circulation (happy slapping), or distributing indecent images of children (e.g. sexting).

The Friary School utilises the curriculum (particularly PSHE, and sex and relationship education) to raise awareness of safeguarding issues so that children are able to recognise the indicators of, for example, grooming behaviours, so that the risks of being drawn into sexual exploitation, or being subjected to abuse, are minimised.

Further, in order to help protect our students:

- Software is in place to minimise access and to highlight anyone accessing inappropriate sites or information
- Students are encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the school's Designated Safeguarding Lead will be informed immediately)

- Students should not give out their personal details, phone numbers, schools, home address, computer passwords etc.
- Students and staff should adhere to the school policy on mobile phones.

The police will be involved if there is any criminal element of misuse of the internet, phones or any other form of electronic media.

Children Missing Education (CME)

This school/ is aware of, and implements in full, the requirements of the statutory guidance for children and young people who are missing from home and/or from education. Local procedures for notifying the local authority and parents are available, understood and followed. Comprehensive records are held and shared between the relevant agencies to help and protect children.

Child Sexual Exploitation (CSE)

Sexual exploitation of children involves situations where young people receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common.

Children do not become entrenched in CSE without first being subjected to targeted grooming or opportunistic abuse. Systemic sexual abuse is the final stage in a process. This school recognises that students/students may be targeted for sexual exploitation, and staff will be vigilant for the indicators and report concerns to the DSL. All staff receive awareness training about CSE. The DSL is conversant with the SSCB procedure (4H) and will share information with parents and carers, and the police and social care in appropriate circumstances. We will work with other agencies on plans to protect children who are deemed to be at risk of exploitation.

This school believes that children need to understand how perpetrators groom children for exploitation. We will use appropriate resources in a sensitive and responsible way to educate young people about grooming behaviours, the risk of being drawn into exploitation, possible consequences, and ways of protecting themselves from the risk of sexual exploitation.

Identifying Cases of Female Genital Mutilation (FGM) & Forced Marriage

Any indications that Female Genital Mutilation (FGM) or Forced Marriage are imminent, or have already taken place, will be dealt with under the child protection procedures outlined in this policy. In support of this provision, we will do everything that we can to ensure that:

- Our school is an 'open environment', where students feel able to discuss issues that they may be facing
- the Designated Safeguarding Leads have a good understanding of the issues surrounding FGM and Forced Marriage and access relevant training
- advice and signposting is available for accessing additional help, e.g. the NSPCC's helpline, ChildLine services, Forced Marriage Unit
- awareness raising about FGM is incorporated in the school's safeguarding training so that all staff and volunteers are able to identify indicators.

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- to alert the DSL to their concerns. This member of staff will then refer concerns to children's social care, who will inform the police if they need assistance. If a student has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the student's wishes.
- **not** to consult or discuss with the student's parents or family, or others within the community.

Preventing Extremism & Radicalisation

As part of our safeguarding ethos we encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the students; reasonably practicable steps have been taken to offer a balanced presentation of opposing views to students. We also have a duty under the Counter Terrorism Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Behaviour Policy for students or the Staff Code of Conduct. We will share information with the First Response Team and/ or the Staffordshire police Prevent team when appropriate. We will also work with Staffordshire's Channel Panel in relevant circumstances. Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned.

All staff receive awareness raising and training in regard to preventing extremism and radicalisation.

Making Referrals

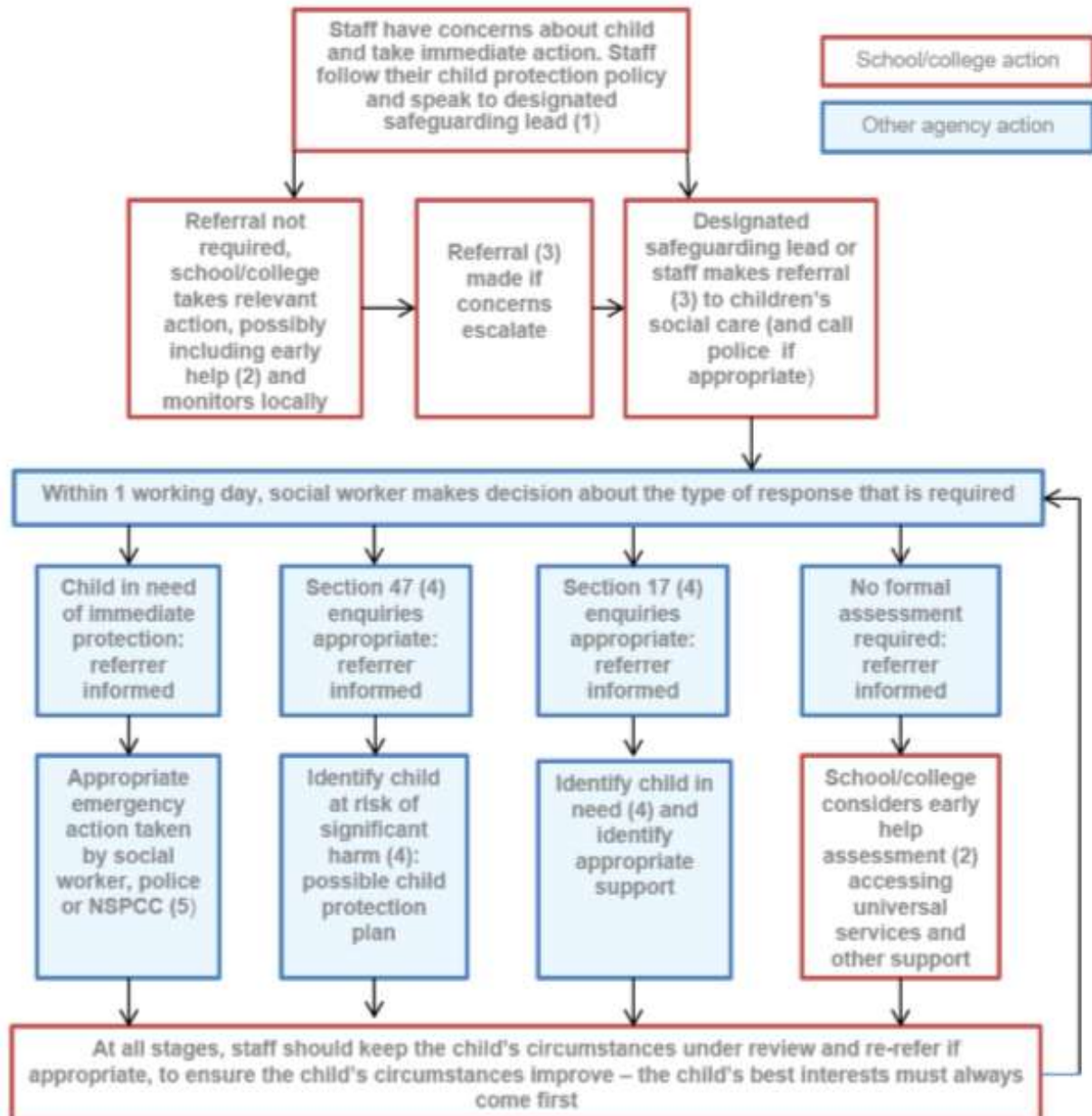
Where a child is registered at school, consultation must take place with the DSL or named deputy, who will be the most appropriate person to initiate any referral. A written record of concerns should be made using the school's internal recording form. This should then be given to the DSL (or deputy if the DSL unavailable) who will then make the decision whether a referral is needed to the First Response Team or the child's existing social worker. If the child lives in an authority outside of Staffordshire, the matter will be referred by the DSL to the relevant Children's Social Care team in that area.

As per statutory government guidance 'Keeping Children Safe in Education', anybody can make a referral. However, due to the role of the DSL this member of staff may be party to additional and pertinent information and therefore is best placed to do so. If it is not possible to speak to the Designated or Deputy DSL, or there would be an unwarranted delay by doing so, the member of staff should contact the First Response Team to discuss concerns. In these circumstances, the DSL must be informed about the referral as soon as possible.

For referral to First Response phone 0800 1313126. The phone call will be followed up with written confirmation on the Multi-agency referral form (MARF) within 48 hours. The multi-agency form is available from the SSCB website (procedure 3B): www.staffsscb.org.uk

In accordance with the government guidance 'Keeping Children Safe in Education', the following flow chart provides an overview of the actions where there are concerns about a child:

Actions where there are concerns about a child



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

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

(3) Referrals should follow the local authority's referral process. Chapter one of [Working together to safeguard children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of [Working together to safeguard children](#).

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

- In cases which also involve an allegation of abuse against a staff member, there is further detailed information in the government guidance 'Keeping Children Safe in Education'
- Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be

arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process

- Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of Working together to safeguard children
- This could include applying for an Emergency Protection Order (EPO)

As part of meeting a child's needs, we recognise the importance of information sharing between professionals and local agencies. Further details on information sharing can be found in Chapter one of Working together to safeguard children and specifically on page 18. Whilst the Data Protection Act 1998 and GDPR place duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. We will not allow fears about the sharing information to stand in the way of the need to promote the welfare and protect the safety of children.

Confidentiality

Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of safeguarding children and child protection. This is a complex area and involves consideration of a number of pieces of legislation.

You can never guarantee confidentiality to a child as some kinds of information may need to be shared with others. A suggested form of words that may help when talking to children is as follows:

- "I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. However, any disclosure of personal information to others, including children's social care departments, must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998, European Convention on Human Rights, Article 8). However, the welfare of the child is paramount (The Children Act 1989) and there may be reasons for not sharing the concerns with the child, their parents or carers prior to making a referral to children's social care.

Information may also be shared without consent in order to prevent or detect a crime, prevent serious harm to a child or adult, or due to a public interest concern. The school follow the information sharing guidance provided by the government and the SSCB in considering the sharing of personal information when there are safeguarding concerns.

The law also requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co- operate with the Local Authority if a child may be at risk of significant harm. Therefore, if the Police or Children's Social Care are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt from the County Legal Services Department.

When children transfer to a new school or college at any time other than key transition points (e.g. move to primary or high school), it may be necessary to inform other partners.

Talking to and Listening to Children

If a child chooses to disclose, you SHOULD:

- be accessible and receptive
- listen carefully and uncritically at the child's pace
- take what is said seriously
- reassure the child that they are right to tell
- tell the child that you must pass this information on
- make a careful record of what was said

You should NEVER:

- take photographs of injuries
- examine marks / injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse - never ask leading questions
- make promises to children about confidentiality or keeping 'secrets'
- assume that someone else will take the necessary action
- jump to conclusions or react with shock, anger or horror
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about people allegedly involved
- forget to record what you have been told
- fail to pass the information on to the correct person
- ask a child to sign a written copy of the disclosure or a 'statement'

In regard to children with communication difficulties or those who use alternative/augmented communication systems, staff may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

Record Keeping

Well-kept records are essential in situations where it is suspected or believed that a child may be at risk from harm. This will include any unexplained bruising, marks or signs of possible abuse or neglect.

Records should:

- state who was present, time, date and place
- use the child's words wherever possible
- be factual/state exactly what was said
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation
- be written in ink and signed by the recorder

Records about child protection or pertaining to welfare concerns or issues, including EHA paperwork, will be retained securely and separately to the curriculum records of the child. If the child moves to another school or education setting, these records will be suitably redacted in regard to the identification of other children

or adults and sent in a timely and secure manner to the DSL of the receiving school or college (record keeping guidance for schools is available on the ESAS website:

Data Protection

A key strand of our Safeguarding arrangements relates to data protection and we operate with a robust Data Protection Policy and accompanying Privacy Notices for students and parents.

Key aspects of our Data Protection Policy relating to safeguarding include:

- ensuring all safeguarding discussions with external safeguarding agencies are undertaken in accordance with our data protection guidelines and retain the confidentiality of the personal information.
- ensuring that all photographic and video images receives parental consent on admittance to the school.
- ensuring that all biometric data receives parental consent on admittance to the school.
- ensuring that all safeguarding / child protection documentation is securely stored and kept highly confidential within the school.

Attendance at Child Protection Conferences

The DSL, their deputy or a senior member of the pastoral team attached to that student's house will be expected to attend the initial Child Protection Conference and Reviews, and provide a written report. (A suggested template for this report is available the Staffordshire Education Safeguarding Team website under Designated Person tab). Parents should be informed of what is in the report as there should be no surprises about the information shared at a Child Protection Conference.

If a child is made subject to a Child Protection Plan then one of the people listed above will attend the subsequent core group meetings and they will be given appropriate support around safeguarding issues by the DSL.

Safer Recruitment

When recruiting new members of staff, the school follows the government guidance 'Keeping Children Safe in Education' 2018 and safer recruitment principles, and has due regard to the Safeguarding Vulnerable Groups Act 2006 and The Protection of Freedoms Act 2012

The school has separate written recruitment and selection procedures in place and ensures that enhanced DBS checks are undertaken in line with government guidance, that appropriate references are obtained, qualifications are verified, and that successful applicants for qualified teacher posts are checked against the 'prohibition of teachers' list. In accordance with regulations and 'Keeping Children Safe in Education' 2018, the school retains a 'single central record' of when the appropriate checks are undertaken in regard to relevant staff.

Safer recruitment training has been undertaken by senior members of staff and appropriate Governors who sit on recruitment panels in accordance with guidance and best practice principles. The school will ensure that at least one person on any appointment panel has undertaken safer recruitment training in accordance with The School Staffing Regulations (England) (2009).

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school or college, as outlined in this guidance. For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity. In summary, a person will be considered to be engaging in regulated activity if, as a result of their work, they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or

- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engage in intimate or personal care or overnight activity, even if this happens only once

For all other staff who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate. This would include contractors who would have the opportunity for contact with children and who work under a temporary or occasional contract.

In addition to obtaining the DBS certificate described, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

Induction & Training

All staff are instructed to read the full government guidance 'Keeping Children Safe in Education' 2018 and have been given a copy.

Newly appointed staff and volunteers have a robust induction into the safeguarding procedures when they join the school. They will be made aware of the Staffordshire Safeguarding Children Board procedures (www.staffsscb.org.uk) as part of that induction programme, and be given access to a copy of part one of 'Keeping Children Safe in Education' 2018, the school safeguarding policy and the staff code of conduct. New staff and others as appropriate will also attend appropriate child protection / safeguarding training at level one delivered annually by the DSL to enable staff to identify signs of possible abuse and neglect and respond in a timely and appropriate way, in accordance with the SSCB training strategy. The child protection and safeguarding training given to each member of the organisation will be refreshed and updated at least every three years. The DSL will retain records of all child protection and safeguarding training accessed by staff and volunteers.

The Designated and Deputy Designated Safeguarding Leads will attend Staffordshire Safeguarding Board Courses at Level Two and above at least every 2 years in order to maintain continuous professional development and comply with statutory guidance and the SSCB training strategy. The DSLs will cascade relevant safeguarding information and training to staff in the school and enable relevant staff to attend specific training events.

In addition all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required to provide them with relevant skills and knowledge to safeguard children effectively.

Professional Support

This school recognises the importance of professional reflective support for staff when working with vulnerable children, particularly in relation to child protection cases.

Arrangements are in place for the Designated Safeguarding Leads to have professional support if required. The Designated Safeguarding Leads offer appropriate support to other staff within the school /college according to need or at their request.

Providing a Safe Working Culture

The Friary School has implemented a staff code of conduct which applies to all permanent and temporary staff, and adult volunteers working in this organisation. Staff and volunteers are in a position of trust. All staff and volunteers must seek to minimise the risk of any situation arising in which children are put at risk, or misunderstandings about their behaviours towards children can occur or be perceived. Staff and volunteers must adhere to the staff code of conduct and follow the safer working practice guidance given by this organisation.

Our code of conduct includes expectations about staff behaviours including outside of the working environment, staff/student relationships and communications including the use of social media. Any reason for staff to be having personal, social contact with students at the school must be explained to the Headteacher with the rationale and any safeguarding actions required will be recorded.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a student or student under 18 years of age, even when the student is over the age of consent. Alongside this, the School Code of Conduct is clear on the inappropriateness of any such relationships, even after the 'child' is 18 years of age, as there remains a professional 'duty of care' that should not allow this relationship to form.

- Staff are advised to use the following sensible precautions when working alone with children:
- Avoid working in isolation with children unless thought has been given to safeguards
- Work in a room where there is a glass panel in the door or leave the door open
- Make sure that other adults visit the room occasionally
- Do not give students lifts home in your car (unless this has been specifically agreed by senior leadership)

Any use of physical force or restraint involving students will be and documented in accordance with the relevant physical intervention policy. If it is necessary to use physical intervention (for example to prevent the child hurting themselves or others), parents will be informed. Children who attend our setting will not be punished by any form of hitting, slapping, shaking or other degrading treatment, including verbal abuse.

Governors at this school recognise their responsibility to remain vigilant and ensure that all staff and volunteers are, and remain, suitable to work with children.

Any staff member, volunteer or governor who becomes the subject of a police investigation in relation to physical or sexual offences against adults or children, or are charged with such a criminal offence, must inform the head teacher/Principal. Staff must disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children whether received before, or during, their employment at the school. (This would not include 'spent' convictions under the Rehabilitation of Offenders Act). The Headteacher will discuss any potential safeguarding matters with the Local Authority Designated Officer (LADO) and any required action will be agreed.

Any staff member, volunteer or governor whose own children become subject to child protection investigations must inform the Headteacher. The Headteacher will discuss the matter with the LADO in accordance with SSCB procedures for dealing with allegations against adults who work in a position of trust with children (SSCB procedure 4a). Appropriate action will be agreed.

Staff have a professional duty to report concerns about the conduct of other adults working in the school if there are indications that a child or children could be at risk of harm. Adults working in this school are encouraged to raise any concerns about conduct or practice so that this can be addressed appropriately. Allegations of abuse made against adults working in the school/college, whether historical or current, should be reported to the head teacher (or, if the allegation is against the head teacher, it should be reported to the Chair of Governors).

Adults working in the school are also able to follow the 'Whistleblowing Policy' (available in the Staff Shared Area) if they feel unable to follow standard procedures relating to an allegation against staff. Staff raising genuine concerns, even if, on investigation, these concerns are not substantiated, will be supported by the senior leadership team, and their employment protected.

Staff who fail to follow the school policies and procedures for safeguarding and promoting the welfare of children may be subject to disciplinary procedures.

Allegations of Abuse Against a Person Working in a Position of Trust

Children can be the victims of abuse by those who work with them in any setting. All allegations of abuse of children in relation to any staff member or volunteer are therefore taken seriously.

In line with government guidance and SSCB procedures, the Headteacher/ Chair of Governors will contact a Local Authority Designated Officer (LADO) to discuss the allegation if the concerns are that an adult in a position of trust has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children (*Keeping Children Safe in Education September 2018*)

This initial discussion will establish the validity of any allegation under SSCB procedures ([link](#) - Procedure 4A) and if child protection enquiries may be required due to a child having possibly suffered, or being at risk of suffering, 'significant harm'. If this is the case a referral will be raised with the relevant social care safeguarding team and a Section 47 child protection strategy meeting will be convened that the Headteacher / Chair of Governors will attend.

If an individual child is not identified but there are concerns about the behaviour of a person in a position of trust which require consideration by other agencies or organisations, the LADO will convene a Position of Trust Meeting (POT) to consider the issues and any action required.

The fact that a member of staff offers to resign will not prevent the allegation procedure and any necessary disciplinary action reaching a conclusion.

The decision of the strategy / joint evaluation meeting could be:

- investigation by children's social care.
- police investigation if there is a criminal element to the allegation.
- single agency investigation completed by the school which should involve the senior HR advisor for the school.

If the matter does not meet the threshold for intervention by other agencies, but concerns remain about the conduct of a person in position of trust working with children, the school will undertake investigatory and, if appropriate, disciplinary action. Referrals to the Disclosure & Barring Service (DBS) will be made by the school when necessary in line with current guidance.

Off-Site Visits and Trips

When young people participate in off-site visits the measures that need to be taken to keep them safe can often be somewhat different to those taken during the normal school day. For example, young people may come in to contact with road traffic, members of the public not known to school staff, or other unfamiliar situations.

The Friary School takes student safety very seriously indeed and thorough risk benefit assessments are always completed in consultation with the latest best practice advice as the planning stage of every off site visit. Such visits includes, for example, organised school holidays, visits to places of interest, partnership activities in the local community and organised excursions to support the curriculum.

We will always consider the benefit to every student as an individual of participating in any proposed off-site visit but also any potential risk their participation may pose, where necessary, to the safety of other participants. We will always discuss any concerns we might have with parents and young people should we

feel, given the evidence we might have about that young person's interactions with others, that they may pose a risk to the safety of others during an off-site visit.

We may extend the risk benefit assessment to cover issues specific to a particular young person's participation or even decide that the risk their participation poses to others outweighs the benefits of their participation. We may in these circumstances decide that a young person's participation, at that time, in an off-site visit is not appropriate. This would not necessarily affect their participation in future off-site visits should the evidence in the future of their subsequent interactions with others or the risk benefit assessment be different. In all considerations the safety of all participant is paramount.

Resources

Section 175 of the Education Act 2002 puts an explicit duty on governing bodies to ensure their functions are exercised with a view to safeguarding and promoting the welfare of students. The governing body will therefore ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly under Staffordshire Safeguarding Children Board procedures including attending meetings, collating and writing assessment reports, and staff training. The governing body will also ensure that all governors have an understanding of safeguarding issues and the policies and procedures that are in place in school to safeguard and promote the welfare of all students in the school. Safeguarding awareness will be addressed through the curriculum as appropriate to ensure all the students understand what is meant by safeguarding and how they can be safe.

Key Documents

The following key documents are referred to and underpin this policy:

- Working Together to Safeguard Children 2018 (DfE)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Staffordshire Safeguarding Children Board Procedures (online)
www.staffsscb.org.uk/professionals/procedures//
- Staffordshire Safeguarding Children Board Training Catalogue (online)
www.staffsscb.org.uk/professionals/Inter-Agencytraining/events/
- Keeping Children Safe in Education April 2016 (DFE)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Disqualification under the Child Care Act 2006
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>
- Staffordshire Policy and Guidance on the Use of Restrictive Physical Interventions (including restraint) in Mainstream Schools
- The Children Act 1989 & 2004
- Education Act 2002
- What to do if you're worried a child is being abused - March 2015 - advice for practitioners (HM Gov)
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- Staffordshire E-Safety Tool Kit
- Children Missing from Education Policy
www.staffordshire.gov.uk/education/welfareservice/missing/CME.aspx

Links with Other School Policies

This policy document should also be considered within the context of the curriculum and other documents relating to our work with children and young people, such as the Whistleblowing Policy. The school records and report all discriminatory incidents via the designated leads.

The link to report to Staffordshire County Council is:

<https://www.staffordshire.gov.uk/community/equalopportunities/reportdiscriminatory/RDI.aspx>

The Designated Safeguarding Lead (DSL) in this school / college is: Ian Rose

The Deputy Designated Safeguarding Lead(s) in this school is: Steve Neale

The Nominated Governor for Safeguarding is: Jamie Checkland

The Chair of Governors is: Jamie Checkland

Further advice on Safeguarding matters can also be obtained from:

First Response Team including LADO advice: 0800 1313126.

- Emergency Duty Team (for out of office hours referrals for children and vulnerable adults): 0845 6042886.
- Staffordshire Prevent Team (Tel: 01785 238239 or 01785 233109) / Email: prevent@staffordshire.pnn.police.uk
- LST (duty contact number): Sue Heath (Tel: 01543 510100)
- Staffordshire Vulnerable Adults referral contact details (for schools where students may be over the age of 18 years and have a physical or sensory impairment; drug or alcohol problems; mental health problem; or learning disability and may not be able to protect themselves from harm or abuse) - 0845 604 2719 or EDT number above
- Staffordshire County Council - Education Safeguarding Advice Service 01785 895836; Email esas@staffordshire.gov.uk
- Website - [Staffordshire Education Safeguarding Advice](#)

Reviewed By	Policies & Procedures Committee	Implementation Date	September 2018	Review Date	December 2019
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