



# VALLEY PARK SCHOOL

## Safeguarding and Child Protection Policy

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### Key document details

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Designated  
Safeguarding Lead

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## Safeguarding and Child Protection Policy

### Key Contact Personnel in School

**Designated Safeguarding Lead:** Mr Daniel Sargent (Senior Assistant Headteacher)

**Deputy Designated Safeguarding Lead(s):** Mrs Margaret Hutchinson (Headteacher), Mr Andrew Whatley (Deputy Headteacher) and Mr Ross Blyth (Senior Assistant Headteacher)

**Named Safeguarding Governor:** Mr Ben Lillicrap and Mr Eddie O'Hanlon



## Safeguarding and Child Protection Policy

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### What to do if you have a welfare concern at the school

#### Why are you concerned?

For example:

- Allegation / child shares a concern or worry
- Indicators of abuse/neglect

#### Immediately record your concerns and, if urgent, speak to a DSL first

Follow the school's procedure (refer to DSL or DDSL and record on My Concern):

- Reassure the child
- Clarify concerns if necessary (TED: Tell, Explain, Describe)
- Use child's own words
- Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead and record incident on My Concern – Mr D. Sargent (DSL)

#### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the KSCB Support Level Guidance document and procedures: [www.kscb.org.uk](http://www.kscb.org.uk)
- Refer to other agencies as appropriate, e.g. internal or community services, LADO, Police or Request for Support
- If unsure then consult with West Kent Education Safeguarding Advisor on 03000 412284 or Local Authority Social Worker at Integrated Front Door.

#### If you are unhappy with the response

##### Staff:

Follow local escalation procedures  
Follow Whistleblowing policy

##### Pupils and parents:

Follow school complaints procedures  
<http://www.valleypark.viat.org.uk/52/policies>

Record decision making and action taken in the pupil's Child Protection / safeguarding file

#### Monitor

Be clear about: What you are monitoring e.g. behaviour trends, appearance etc.  
How long you will monitor  
Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary)

At all stages the child's circumstances will be kept under review.  
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**.

## Safeguarding and Child Protection Policy

### 1. Introduction and Ethos

- Valley Park School is a community and all those directly connected (staff, volunteers, governors, parents/carers, families and students) have an essential role to play in making it safe and secure. Valley Park School recognises our statutory responsibility to safeguard and promote the welfare of all children.
- Valley Park School believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and have their wishes and feelings taken into account and that all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Valley Park School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what service to provide.
- All staff working with children at Valley Park School are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned, and this includes sexual abuse, sexual harassment and discrimination. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult they should act immediately.
- Our school core safeguarding principles are:
  - Prevention – positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures;
  - Protection – following the agreed procedures, ensure all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns;
  - Support – for all students, parents/carers and staff and, where appropriate, specific interventions are required for those who may be at risk of harm;
  - Working with parents/carers and other agencies – to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- Valley Park School expects that if any member of our community has a safeguarding concern about any child or adult, they should act immediately.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2021 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2021. All school staff (including temporary staff and volunteers) will have access to a copy of this policy and it will also be available to parents/carers. The policy will be reviewed annually.

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### 2. Definition of Safeguarding

- “Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education.” (Inspecting safeguarding in early years, education and skills settings, Ofsted, September 2018).
- All safeguarding policies will be reviewed on an annual (minimum) basis by the Local School Board which has responsibility for oversight and will facilitate a whole school approach to safeguarding and child protection systems. The Designated Safeguarding Lead / Head Teacher will ensure regular reporting on safeguarding activity and systems in school to the Local School Board. The Local School Board will not receive details of individual student or family situations or identifying features of families as part of their oversight responsibility.
- In line with KCSIE 2021, safeguarding and promoting the welfare of children is defined for the purpose of this policy as:
  - Protecting children from maltreatment;
  - Preventing impairment of children’s mental and physical health or development;
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
  - Taking action to enable all children to have the best outcomes.
- Valley Park School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect;
  - Bullying (including cyber-bullying);
  - Children with family members in prison;
  - Children Missing Education (CME);
  - Child missing from home or care;
  - Child Sexual Exploitation (CSE);
  - Child Criminal Exploitation;
  - Contextual Safeguarding (risks outside the family home);
  - County Lines;
  - Cyber crime;
  - Domestic Abuse;
  - Drugs and alcohol misuse;
  - Fabricated or induced illness;
  - Faith abuse;
  - Female Genital Mutilation (FGM);
  - Forced marriage;
  - Gangs and youth violence;
  - Gender based abuse and violence against women and girls;
  - Hate or Honour based abuse;
  - Homelessness;
  - Human Trafficking and Modern Slavery;
  - Mental health;
  - Missing children and adults;
  - Online safety;

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- Peer on Peer Abuse;
- Preventing radicalisation and extremism;
- Private fostering;
- Refugee status;
- Relationship abuse;
- Serious Violence;
- Sexual Violence and Sexual Harassment;
- Upskirting;
- Youth produced sexual imagery – ‘nudes’

Also, see Appendix B: Specific forms of Abuse (‘Keeping Children Safe in Education’ 2021).

### 3. Context

Valley Park School is a large mixed-gender secondary school that provides for students between the ages of 11 and 18. Our duty of care extends to all members of our school community and we endeavour to provide a safe and secure environment which allows all students and staff members to be safe, feel safe and to thrive. We aim to promote a “tell culture” for all members of the community, to ensure that anyone at risk or harm feels sufficiently secure to seek help, guidance and/or support, as early as possible.

Our experience suggests the key factors which can make a Valley Park student vulnerable may include, but are not limited to, the following:

- Online and E-safety to include sexting and grooming;
- County Lines;
- Mental Health worries and self-harm;
- Drugs and alcohol usage;
- Self-harm;
- Peer on peer abuse, including unwanted sexualised and discriminatory comments and harassment.

The above is not an exhaustive list and each student’s level of vulnerability can depend on their personal circumstances. We do not assume that a student, who may not be regarded as a vulnerable student within the school site, does not become vulnerable when off-site. We educate our students on all safeguarding matters through our RSE PSHE, Tutor Time and Assemblies programme (Personal Development curriculum) with a focus on positive relationships and good communication, promoting an ‘open door’ policy for all.

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
  - DfE guidance Keeping Children Safe in Education 2021 (KCSIE);
  - DfE advice/guidance: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges 2021
  - Working Together to Safeguard Children 2018 (WTSC);
  - Ofsted: ‘Education Inspection Framework’ 2019;
  - Ofsted: Review of Sexual Abuse in Schools and Colleges 2021;
  - Framework for the Assessment of Children in Need and their Families (2000);
  - Kent and Medway Safeguarding Children Procedures (online);

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- The Education Act 2002;
  - The Education (Independent School Standards) Regulations 2014;
  - The Non-Maintained Special Schools (England) Regulations 2015.
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are students at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
  - The way Valley Park School is currently operating in response to Coronavirus (Covid-19), however, our safeguarding principles in accordance with KCSIE 2021 and related government guidance remain the same. We will continue to follow government guidance and will amend this policy as necessary. See Appendix 4 for further information.
  - We acknowledge that some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety during 2020 and 2021 and, in some cases, there will be increased welfare and safeguarding risks arising from the Coronavirus pandemic. We will work with local services, such as health and the Local Authority, to ensure necessary services are in place to support learners.

### 4. Related Safeguarding Policies

- This policy is one of a series in the school's integrated protection portfolio and should be read in conjunction with the policies which cover (but are not limited to) the subjects and procedures below:
  - Behaviour Management, linked to the Use of Physical Intervention;
  - Searching, screening and confiscation;
  - Online Safety, Social Media and Mobile Technology;
  - Anti-Bullying;
  - Data Protection and Information Sharing;
  - Image use;
  - Sex and Relationship Education;
  - Personal and Intimate Care;
  - Health and Safety;
  - Attendance;
  - Risk Assessments (e.g. school trips, use of technology);
  - First Aid and Accidents;
  - Managing Allegations Against Staff;
  - Staff Behaviour Policy / Code of Conduct of Staff (including Acceptable Use of Technology);
  - Safer Recruitment;
  - Whistleblowing.

### 5. Key Responsibilities

- The Local School Board (LSB), Headteacher, Senior Team and staff have read and will follow KCSIE 2021. They will also adopt, understand and follow the school's Safeguarding and Child Protection Policy and procedures.



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- The school has a nominated link governor for safeguarding. The nominated link governor will support the DSL and will take the lead role within the LSB to ensure that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The LSB, Headteacher and Senior Team will ensure that the DSL and Deputy DSL team are properly supported in their roles.

### Governance and Leadership

- The Local School Board and Senior Team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Local School Board have regard to the KCSIE 2021 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The school has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The Local School Board and Senior Team will ensure that the DSL and Deputy DSL team are supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The Headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the Local School Board are understood, and followed by all staff.

### 5.1 Designated Safeguarding Lead (DSL)

- The school has appointed a member of the Senior Team (Dan Sargent, Senior Assistant Headteacher) as the Designated Safeguarding Lead (DSL). Additionally, the school has appointed three Deputy DSLs (Margaret Hutchinson, Headteacher; Andrew Whatley, Deputy Headteacher and Ross Blyth, Senior Assistant Headteacher) who will have delegated responsibilities and act in the DSL's absence.
- The DSL has overall responsibility for the day to day oversight of safeguarding child protection systems, including online safety, in school. While the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any Deputy DSL training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The Headteacher will be kept informed of any significant issues by the DSL.

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- The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and children regarding any new safeguarding and welfare concerns following Covid-19. This may include handling of referrals to integrated social care and working with other agencies where appropriate.
- **It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2021. This includes but is not limited to:**
  - Act as the central contact point for all staff to discuss any safeguarding concerns;
  - Maintain a confidential recording system for safeguarding and child protection concerns;
  - Co-ordinate safeguarding action for individual children;
    - When supporting children with a social worker or Looked After Children, the DSL should have the details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child (the DSL is the designated teacher);
  - Liaise with other agencies and professionals in line with KCSIE 2021 and WTSC 2018;
  - Ensure that locally established procedures are put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed as necessary;
  - Represent, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences);
  - Manage and monitor the school's role in any multi-agency plan for a child;
  - Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns;
  - Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and school leadership staff;
  - Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and / or out of terms activities;
  - Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2021).
  - Inform the Headteacher of any significant safeguarding issues.

### Members of Staff

- **All members of staff have a responsibility to:**
  - Provide a safe environment in which children can learn;
  - Adopt an 'it can happen here' attitude to sexual abuse and harassment within school;
  - Be prepared to identify children who may benefit from early help;
  - Understand the early help process and their role in it;
  - Understand the schools safeguarding policies and systems;
  - Undertake regular and appropriate training which is frequently updated;
  - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989;
  - Know what to do if a child says that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child;
  - Be able to identify and act upon indicators children are, or at risk of, developing mental health issues;
  - Know how to maintain an appropriate level of confidentiality;

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- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may need help or protection;
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

### Children and Young People

- **Children and young people (learners) have a right to:**
  - Feel safe, be listened to, and have their wishes and feelings taken into account;
  - Know what will probably happen next, after they raise a concern with school;
  - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback;
  - Contribute to the development of school safeguarding policies;
  - Receive help from a trusted adult;
  - Learn how to keep themselves safe, including online.

### Parents and Carers

- **Parents/carers have a responsibility to:**
  - Understand and adhere to the relevant school policies and procedures;
  - Talk to their child about safeguarding issues and support the school in their safeguarding approaches;
  - Identify behaviours which could indicate that their child is at risk of harm including online, and seek help and support from the school, or other agencies.

Parents/carers can obtain a copy of the school Safeguarding and Child Protection Policy and other related policies on request and can view them via the school website [www.valleypark.viat.org.uk](http://www.valleypark.viat.org.uk)

## 6. Recognition and Types of Abuse and Neglect

- **All staff in school are made aware of the definitions and indicators of abuse and neglect, as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021.** This is outlined locally within the Kent Support Levels Guidance.

### There are four categories of abuse:

- Physical abuse;
  - Sexual abuse;
  - Emotional abuse;
  - Neglect.
- Members of staff are aware that child welfare concerns may arise in different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean the child is being abused, however, all concerns should be taken seriously and be explored by the DSL on a case by case basis.
  - Valley Park School recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will

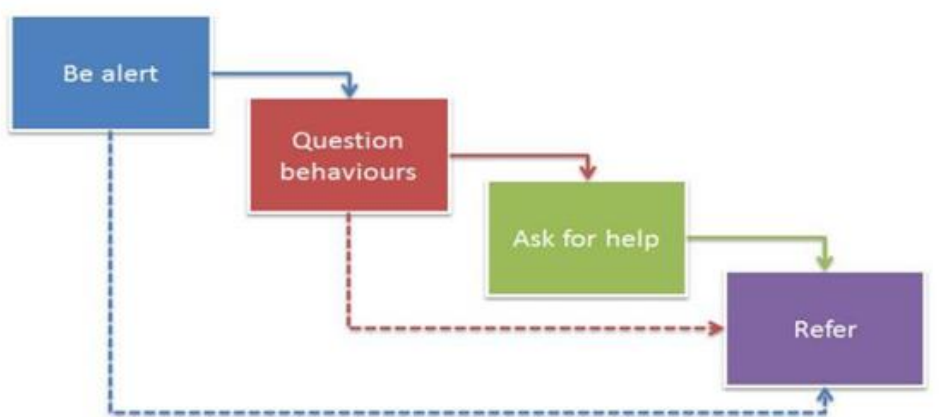
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overlap with one another, therefore, staff will always be vigilant and will always raise concerns with the DSL.

- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents/carers who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and / or behaviours can be associated with factors and risks outside the school and / or can occur between children off-site. Children can be at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms, including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and, in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

### 7. Safeguarding and Child Protection Procedures

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



[‘What to do if you are worried a child is being abused’](#) 2015.

- In all cases, if staff are unsure, they will always speak to the DSL or Deputy DSL.
- The school recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

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### 7.1 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
  - Listen carefully to the concern and be non-judgemental;
  - Only use open questions to clarify information where necessary, e.g. who, what, where, when. Or, Tell Explain Describe (TED);
  - Not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially integrated children's services;
  - Be clear about boundaries and about how the report will be progressed;
  - Record the concern in line with the school's record-keeping requirements;
  - Inform the DSL or a deputy as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the Senior Team and / or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door.
- Valley Park School adheres to the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
  - The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and /or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found here: [www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services](http://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services)
- If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Integrated Children's Services (Front Door) and / or the police in line with KSCMP procedures.
  - Valley Park School recognises that in situations where there are immediate child protection concerns identified in line with Support Level Guidance, it is NOT to investigate as a single agency but to act in line with KSCMP guidance which may involve multi-agency decision-making.
  - The DSL may seek advice or guidance from the Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
  - They may also seek advice for guidance from a social worker at the Front Door service, who are the first point of contact for Integrated Children's Services (ICS).
  - If anyone other than the DSL makes a referral to external services, they will inform the DSL as soon as possible.
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed, and consent to this will sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm, or would undermine a criminal investigation.
- All staff are aware of the process for making requests for support referrals for statutory assessments under The Children's Act 1989, along with the role they might be expected to play in such assessments.
- Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (Or a deputy) will generally lead as appropriate and will make a request for support via the Front Door.

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- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.
- Valley Park School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

### 8. Record-Keeping

- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Staff will record any welfare concern that they have about a child on the My Concern system, using the body map if injuries have been observed, and submit them without delay to the DSL. If there is an immediate concern, the member of staff should consult with the DSL before completing a My Concern referral as reporting urgent concerns takes priority.
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by a member of staff. Child Protection records will record facts and not personal opinions.
- If members of staff are in any doubt about recording requirements they will discuss their concerns with the DSL.
- Child Protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and details regarding any actions taken, decisions reached and the outcome.
- Child Protection records are kept for individual children and are maintained separately from all other records relating to the child in the school. Records are kept confidentially in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All Child Protection records will be transferred in accordance with data protection legislation to the child's subsequent school / setting, under confidential and separate cover as soon as possible. These will be given to the new DSL and a receipt of delivery will be obtained.
- In addition to the Child Protection file, the DSL will also consider if it would be appropriate with the DSL at the new school or college in advance of the child leaving, for example, information that would allow the new school or college to continue to provide support.

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- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- Where Valley Park School receives Child Protection files, the DSL will ensure key staff such as the Special Educational Needs Co-Ordinators (SENCOs) will be made aware of relevant information required.
- Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of that inquiry.
- My Concern records are kept securely on the central database which can only be accessed by the DSL and members of the Safeguarding Team.
- The Headteacher will be kept informed of any significant issues by the DSL.

### 9. Multi-agency Working

- Valley Park School recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC 2018). The School Senior Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.
- Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. Valley Park School recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

### 10. Confidentiality and Information Sharing

- Valley Park School recognises its duty and power to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.
- Valley Park School has an appropriately trained Data Protection Officer as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. Our Data Protection Officer is: **Judicium Education**
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare, and protect the safety of children (KCSIE 2021). DfE Guidance on Information Sharing (July 2018) provides further detail. Decisions to share or not to share and why are recorded on any referrals made. Should anyone contact the school requesting information - checks are made as to who they are and from what service. Where necessary and appropriate,

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parents/carers are contacted to authorise the sharing of information. Alternatively, advice is sought from the Kent Safeguarding Team or through contact with Social Services or the LADO should the allegation be against a member of staff.

- All members of staff must be aware that while they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware that they cannot promise a child to keep secrets that might compromise the child's safety or wellbeing.
- All staff at Valley Park School recognise that all matters relating to child protection are confidential. The Headteacher or DSL will only disclose information about a student to other members of staff on a 'need to know' basis.

### 11. Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents/carers, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the school website [www.valleypark.viat.org.uk](http://www.valleypark.viat.org.uk).
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on [0800 136 663](tel:0800136663) or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- The senior team at Valley Park School will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with this policy.

### 12. Specific Safeguarding Issues

- Valley Park School is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read annex B of KCSIE 2021 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.



## Safeguarding and Child Protection Policy

### 13. Peer on Peer Abuse

- All members of staff at Valley Park School recognise that children are capable of abusing their peers, and that it can happen both inside and outside school and online.
- Valley Park School recognises that peer on peer abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying;
  - abuse in intimate personal relationships between peers;
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence and sexual harassment;
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
  - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  - initiation/hazing type violence and rituals.
- Valley Park School recognises that failing to take serious, or even dismissing or downplaying, sexual harassment and/or discriminatory behaviour as "having a laugh", "a joke", "banter" or "just part of growing up" leads to a normalised culture of unacceptable, unsafe, behaviours that students become reluctant to report. Students are encouraged to come forward with their concerns and staff know to treat reports seriously, reassuring the student that they have done the right thing in coming forward.
- Valley Park School recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place. The school maintains an 'it can and does happen here' mindset.
- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Concerns about a learner's behaviour, including peer on peer abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies. Section 89(5) of the Education and Inspections Act 2006 gives Headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.
- In order to minimise the risk of peer-on-peer abuse, Valley Park School will:
  - Ensure a robust Anti-Bullying Policy is implemented at all times;
  - Ensure staff training is regularly kept up to date;
  - Ensure all students are provided with an age/ability appropriate PSHE curriculum through our POP programme as well as an appropriate RSE curriculum;

## Safeguarding and Child Protection Policy

- Provide all students the opportunity to disclose any concerns using the facilities available in the Student Support Centre.
- Valley Park School wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by peer on peer abuse will be supported by:
  - Pastoral staff who will listen carefully and take any reports seriously, avoiding victim blaming;
  - Pastoral staff will also liaise with parents/carers appropriately;
  - All staff who will ensure school policies, with regards to anti-bullying, behaviour and child protection procedures are followed when they become aware of any concerns;
  - Provision of in house counselling services and external agency support where appropriate.

### 14. Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child on child sexual violence or harassment, Valley Park School will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#) guidance.
- Valley Park School recognises sexual violence and sexual harassment can occur between two children of any age and gender. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff, and any actions that are required to protect them.
- Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children’s Services and/or the Police.
  - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or school/college staff, and, any other related issues or wider context.

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- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

### 15. Nude and/or Semi-Nude Image Sharing by Children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

The UKCIS [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older learners.

- Valley Park School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
  - Not delete the imagery or ask the child to delete it.
  - Not say or do anything to blame or shame any children involved.
  - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
  - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
  - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
  - All decisions and action taken will be recorded in line with our child protection procedures.
  - A referral will be made to ICS and/or the police immediately if:
    - the incident involves an adult (over 18).

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- there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

### 16. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- Valley Park School recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

### 17. Serious Violence

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
  - The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

### 18. So-called honour based abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with this policy. Staff will report any concerns about HBA to the DSL (or a deputy).
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

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- If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### 19. Preventing radicalisation

- Valley Park School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Valley Park School recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow.

### 20. Cybercrime

- Valley Park School recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

### 21. Supporting Children Potentially at Greater Risk of Harm (see also Appendix 6)

- Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

#### Safeguarding Children with Special Educational Needs or Disabilities (SEND)

- Valley Park School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- Valley Park School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

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- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.

### Children Requiring Mental Health Support

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy. The DSL also leads on mental health and wellbeing across the school, supported by other members of the Senior Team (Jasmine Hider, AHT and Mark Lisbon, AHT).

### Children Missing from Education

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.
- Where the school/college have concerns that a child is missing from education, we will respond in line with our statutory duties and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

### Elective Home Education

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#) and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

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### Children who need a Social Worker

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform the school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

### Looked after children, previously looked after children and care leavers

- Valley Park School recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- The school has appointed a designated teacher (see Children in Care policy) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher is the school's DSL, ensuring appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the school believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

## 22. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Valley Park School employs a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Valley Park School will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Valley Park School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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- Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example 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. For example, 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.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Valley Park School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.
  - The Headteacher will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the Local School Board.

### Policies and Procedures

- The DSL has overall responsibility for online safety within the school but will liaise with the Deputy Head responsible for Online Learning and other members of staff including the IT team and all curriculum leads as necessary.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our online safety, anti-bullying, social media and behaviour policies to ensure:
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- Valley Park School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Valley Park School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2021, Valley Park School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. All details can be found in our Online Safety policy which can be found on the school website.
- Valley Park School operates an 'On site, Out of Sight' policy in respect of mobile phones at all times of the school day.



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### Appropriate Filtering and Monitoring

- Valley Park School will do all we reasonably can to limit children’s exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
- If learners or staff discover unsuitable sites or material, they are required to raise any concerns with the DSL.
  - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
  - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
  - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
  - When implementing appropriate filtering and monitoring, the school will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Valley Park School acknowledges that, whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.
  - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
  - Learners internet use will be supervised by staff according to their age and ability.
  - Learners will be directed to use age appropriate online resources and tools by staff.

### Information Security and Access Management

- Valley Park School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our Acceptable Use Policy and Online Safety Policy.
- Valley Park School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

### Staff Training

- Valley Park School will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

### Educating Learners

- Valley Park School will ensure a comprehensive Digital Literacy and Online Safety Personal Development curriculum is in place to enable all learners to learn about and manage online risks effectively and will support parents/carers and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online, and the ways in which to do so as part of providing a broad and balanced curriculum.

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### Working with Parents/Carers

- Valley Park School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
  - Providing information on the Parent Portal;
  - Including update information in our weekly newsletter;
  - Providing parents/carers with support upon request regarding any online safety concerns in relation to their child.

### Remote Learning

- Valley Park School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our Behaviour Policy, Code of Conduct, Online Safety Policy and Acceptable Use Policy.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow the guidance detailed here and in the Online Safety Policy and Remote Learning Acceptable Use Policy (AUP).
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Valley Park School will continue to be clear who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

## 23. Staff Engagement and Expectations

### Awareness, Induction and Training

- All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' 2021 which covers safeguarding information for staff.
  - School leaders, including the DSL will read KCSIE in its entirety.
  - All members of staff have completed online training to confirm that they have read and understood the national guidance shared with them. Training records are held by the staff responsible for CPD. All staff have to complete and pass a knowledge based assessment as part of their training.

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- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction, as well as any updates since the most recent training. This is achieved through:
  - Specific in house online training and assessment;
  - Information leaflets detailing school policy.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety and whistleblowing) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This is achieved through:
  - A regular Staff Bulletin;
  - Staff meetings where necessary.
- All staff, through their training, are aware that there are a range of risk factors which increase a child's likelihood of being involved in serious violence (eg, male gender, frequent absence from school, experience of maltreatment/abuse and involvement in criminal activity – KCSIE 2021).
- Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies through their online training, an open door policy and through invitation at staff meetings.
- The DSL and Headteacher will provide an annual report to the Local School Board detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.
- Although the school has a nominated lead for the Local School Board all members of the Local School Board will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.
- All staff training will have regard to the Teachers' Standards to support the expectation that teachers:
  - Manage behaviour effectively to ensure a good and safe environment;
  - Have a clear understanding of the needs of all pupils/students.

### Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school Behaviour Policy.

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- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff Behaviour Policy and Acceptable Use Policy.
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff Code of Conduct, Acceptable Use Policies, and Social Media.

### Supervision and Support

- The new staff induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## 24. Safer Recruitment and Allegations

### Safer Recruitment and Safeguarding Checks

- Valley Park School is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
  - Valley Park School will follow relevant guidance in Keeping Children Safe in Education 2021 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS);
  - The Local School Board and Senior Team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance;
  - The Local School Board will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

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- Valley Park School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the school places a learners with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
  - The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in part Three of KCSIE 2021.
- Where the school organises homestays as part of exchange visits, we will follow the advice and guidance as identified in part Three and Annex E of KCSIE 2021.
- We will ensure that all staff and volunteers have read the Staff Code of Conduct and understand that their behaviour and practice must be in line with it.

### **Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors (also see Appendix 5)**

- The school will respond to allegations in line with the [local Kent allegations arrangements](#) and [Part Four of KCSIE 2021](#). In depth information can be found within our 'Statement of Procedures for dealing with Allegations against Staff' and Staff Code of Conduct policy. This can be found on the website.
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where Headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. Such concerns will always be taken seriously by the Senior Team and such discussions are encouraged.

### **Concerns that meet the 'harm threshold'**

- Valley Park School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has
  - behaved in a way that has harmed a child, or may have harmed a child and/or

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- possibly committed a criminal offence against or related to a child and/or;
  - behaved towards a child or children in a way that indicates he or she 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.
- Allegations against staff which meet this threshold will be referred immediately to the Headteacher or Deputy Headteacher who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Headteacher, staff are advised that allegations should be reported to the Chair of the Local School Board who will contact the LADO.

### Concerns that do not meet the 'harm threshold'

- Valley Park School may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the school, the Headteacher will share or liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our staff Code of Conduct – this includes what a low-level concern is and the importance of sharing them.

### Safe Culture

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff Code of Conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Valley Park School takes all concerns or allegations received seriously.
- All members of staff are made aware of the Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Valley Park School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has

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committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#).

### 25. Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff are expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on the school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site. Visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

### 26. The Use of School Premises by Other Organisations

- Where services or activities are provided separately by another body using the school premises, the Head Teacher and Local School Board will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.
- If this assurance is not achieved then an application to use school premises will be refused.

### 27. Opportunities to teach safeguarding

- Valley Park School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and Health Education.
- We recognise that school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

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- Valley Park School recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

### 28. Physical Safety

#### Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour Policy.

#### The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the school facilities/premises, the Headteacher and Local School Board will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

#### Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.



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### 29. Local Support

- All members of staff in Valley Park School are made aware of local support available.
- **Education Safeguarding Service**
  - **Area Safeguarding Advisor**
    - <https://www.theeducationpeople.org/our-expertise/safeguarding/safeguarding-contacts/>
    - West Kent Area Safeguarding Adviser (Education) – 03000 41 22 84
  - **Online Safety in the Education Safeguarding Service**
    - 03000 415797
    - [esafetyofficer@theeducationpeople.org](mailto:esafetyofficer@theeducationpeople.org) (non-urgent issues only)
- **LADO Service**
  - **Telephone: 03000 410888**
  - Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
- **Integrated Children's Services**
  - Front door: 03000 411111
  - Out of Hours Number: 03000 419191
- **Kent Police**
  - 101 or 999 if there is an immediate risk of harm
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
  - 03000 421126
- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email: [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

### 30. National Support

- **Support for staff**
  - Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
  - Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- **Support for learners**
  - ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
  - Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
  - The Mix: [www.themix.org.uk](http://www.themix.org.uk)
  - Shout: [www.giveusashout.org](http://www.giveusashout.org)
  - Fearless: [www.fearless.org](http://www.fearless.org)
- **Support for adults**
  - Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
  - Crimestoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)

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- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
  
- **Support for Learning Disabilities**
  - Respond: [www.respond.org.uk](http://www.respond.org.uk)
  - Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
  
- **Domestic Abuse**
  - Domestic Abuse Services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
  - Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
  - Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
  - Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
  - Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
  - National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
  - Respect Phone line: <https://respectphoneline.org.uk>
  
- **Honour-based Abuse**
  - Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
  - FGM Factsheet: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
  - Mandatory reporting of female genital mutilation, procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
  
- **Contextual Safeguarding, Peer on Peer abuse, Sexual Exploitation and Criminal Exploitation:**
  - Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
  - National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
  - Rape Crisis: <https://rapecrisis.org.uk>
  - Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
  - Brook: [www.brook.org.uk](http://www.brook.org.uk)
  - Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
  - Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
  - Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
  - Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
  
- **Substance Misuse**
  - We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
  - Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)
  
- **Mental Health**
  - Mind: [www.mind.org.uk](http://www.mind.org.uk)
  - Moodspark: <https://moodspark.org.uk>
  - Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)

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- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- **Online Safety**
  - CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
  - Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
  - Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
  - Childnet: [www.childnet.com](http://www.childnet.com)
  - UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
  - Report Harmful Content: <https://reportharmfulcontent.com>
  - Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
  - Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
  - Internet Matters: [www.internetmatters.org.uk](http://www.internetmatters.org.uk)
  - NSPCC/Net Aware: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
  - Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
  - Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
  - Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- **Radicalisation and Hate**
  - Educate Against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
  - Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)  
True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## Safeguarding and Child Protection Policy

### APPENDIX 1 – Categories of Abuse

**All 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.**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children. All members of staff should read and understand Part One of 'Keeping Children Safe In Education' 2021 and the Senior Team should read the entire document.

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

#### Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and school performance;
- Displays of affection which are sexual and age inappropriate;
- Self-harm, self-mutilation or attempts at suicide;
- Alluding to secrets which they cannot reveal;
- Tendency to cling or need constant reassurance;
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby;
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger;
- Unexplained gifts or money;
- Depression and withdrawal;
- Fear of undressing for PE;
- Sexually transmitted disease;
- Fire setting.

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

#### Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)

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- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

### Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes;
- Lack of self-confidence/esteem;
- Sudden speech disorders;
- Self-harming;
- Eating Disorders;
- Extremes of passivity and/or aggression;
- Compulsive stealing;
- Drug, alcohol, solvent abuse;
- Fear of parents/carers being contacted;
- Unwillingness or inability to play;
- Excessive need for approval, attention and affection.

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

### Signs that MAY INDICATE neglect

- Constant hunger;
- Poor personal hygiene;
- Constant tiredness;
- Inadequate clothing;
- Frequent lateness or non-attendance at school;
- Untreated medical problems;
- Poor relationship with peers;
- Compulsive stealing and scavenging;
- Rocking, hair twisting and thumb sucking;
- Running away;

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- Loss of weight or being constantly underweight;
- Low self-esteem.



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### APPENDIX 2 – Keeping Yourself Safe When Responding to Disclosures

(THE 6 R'S- WHAT TO DO IF...)

#### 1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said.

#### 2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- **Do not promise confidentiality**; you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know.

#### 3. React

- React to the student only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did they....?" Such questions can invalidate evidence
- **Do** ask open 'TED' questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for them
- Do not ask the student to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to.

#### 4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child  
Always ensure that as far as possible you have recorded the actual words used by the child
- Record statements and observable things rather than your interpretations or assumptions.

#### 5. Remember

- Contact the Designated Safeguarding Lead (DSL)
- The DSL may be required to make appropriate records available to other agencies
- KSCB: [www.kscb.org.uk](http://www.kscb.org.uk)
- There is a mandatory duty upon teachers to report to the police where FGM appears to have been carried out on a girl under the age of 18.

#### 6. Relax

- Get some support for yourself. Dealing with disclosures can be traumatic for professionals.
- Speak to the Headteacher if professional support is applicable.

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### APPENDIX 3 – Coronavirus (COVID 19) (including during Enforced School Closure)

During any school closure, in response to COVID-19 and with arrangements in place for a Virtual School, we will adhere to Safeguarding Policy. Please note the following key arrangements in place during school closure:

- An online platform (My Concern) is used for staff to report any safeguarding concerns. The DSL and Deputy DSLs have access to this from home and can respond to any safeguarding concerns as they are raised. Should all members of the DSL team become ill at this time of closure, there are additional Safeguarding Officers and issues will be overseen by another member of the Senior Team to ensure appropriate actions have been taken. Where necessary, support from elsewhere within the Trust will be sought.
- Should Parents/Carers have any concerns about the safety of their child during school closure, contact can be made with the DSL or Deputy DSLs by using the school telephone number or the following e mail addresses:
  - **Designated Safeguarding Lead:** Daniel Sargent, Senior Assistant Headteacher – [d.sargent@valleypark.viat.org.uk](mailto:d.sargent@valleypark.viat.org.uk)
  - **Deputy Designated Safeguarding Lead:** Margaret Hutchinson, Headteacher – [m.hutchinson@valleypark.viat.org.uk](mailto:m.hutchinson@valleypark.viat.org.uk), Andrew Whatley, Deputy Headteacher – [a.whatley@valleypark.viat.org.uk](mailto:a.whatley@valleypark.viat.org.uk) and Ross Blyth, Senior Assistant Headteacher – [r.blyth@valleypark.viat.org.uk](mailto:r.blyth@valleypark.viat.org.uk)
  - Emails sent to [manager@valleypark.viat.org.uk](mailto:manager@valleypark.viat.org.uk) are monitored centrally, including in the event of Virtual School being deployed.
- Staff will continue to look after the wellbeing and safety of our students through virtual school activities, whereby students will follow their normal daily timetable, staff in regular contact with students and colleagues, and teachers/pastoral staff will raise any concerns regarding wellbeing and attendance via the appropriate channels.
- Students considered to be particularly vulnerable will be supported with more regular personalised contact from pastoral staff, SENCOs and welfare leads, and provision of in-school learning will be prioritised.
- School provision will be put in place for children of Key Worker parents/carers and vulnerable students when appropriate. Staff at the provision will have had safeguarding training and there will be an allocated Duty DSL on site.
- All forms of abuse are a priority for follow up action and any new cases will be dealt with in liaison with the appropriate external agencies by the DSL or Deputy DSL.
- Parents/Carers have been reminded to pay particular attention to their child's online safety at a time of increased use of social media and other online platforms. Security measures are in place across all school software, monitoring student use. Any concerns will be flagged to the DSL or Deputy DSL and or Online Safety Coordinator (for education support) for ongoing action as necessary.
- School staff will continue to adhere to 'whistle blowing' procedures should they become concerned about the safety of a colleague working within school.



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### APPENDIX 4 – Specific Safeguarding Issues (ALSO SEE ANNEX B OF KEEPING CHILDREN SAFE IN EDUCATION 2021)

#### Child abduction

Child abduction is the unauthorised removal or retention of a child from an individual who has legal responsibility for the child. It can be committed by a stranger, and the school recognises that it may also be committed by another family member or someone known, but not related, to the victim.

The school has a procedure in place for responding to unauthorised absence and for mitigating risk where a risk has been identified. The school recognises that positive working relationships with its families is the most impactful strategy in keeping children safe.

As students' independence increases with age, the school's Personal Development programme supports them to improve their own strategies for keeping themselves safe.

#### Children and the court system

Children are sometimes required to give evidence in criminal court, either due to crimes committed against them, or crimes witnessed. The school is committed to supporting students pastorally in the event that this situation arises, including by engaging external agency support where necessary, and the following guides are used as a source of information and guidance:

- <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
- <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

#### Children missing from education

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

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

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

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- 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.

### **Children with family members in prison**

The school recognises that children are sometimes belonging to a family wherein a parent has been sent to prison, and it acknowledges that this factor places them at enhanced risk of poor outcomes, poverty, stigma, social isolation and poor mental health, including bullying.

The school has procedures in place for dealing with bullying (see Anti Bullying Policy) and is committed to supporting students pastorally whilst their parent is imprisoned and afterwards, engaging external agency support where appropriate.

The school recognises that the National Information Centre on Children of Offenders (NICCO) is an organisation that can support and help mitigate negative consequences for its students <https://www.nicco.org.uk/>.

### **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.

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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 child sexual 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.

All school staff have been made aware of the revised definition of Child Sexual Exploitation, as issued in the Department for Education guide:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

The school recognises that a child may be sexually exploited by their peers and, where this is identified to be the case, school protocols identify that the child perpetrator is also a victim, and may also be a victim of sexual exploitation in their own right.



## **Safeguarding and Child Protection Policy**

### **Community safety incidents**

The school recognises that incidents within the vicinity of the school are a matter of concern for parents/carers and students, and it therefore takes a proactive stance in communicating with the Kent Police School Liaison Officer and in responding to concerns raised by local residents and other local schools.

The school's Personal Development programme supports students, in an age-appropriate manner, to improve their own strategies for keeping themselves safe.

### **County Lines and Child Criminal Exploitation (CCE)**

The school recognises that children are becoming increasingly targeted and recruited into County Lines operations, including via social media, and it also recognises that indicators of CME, CCE and CSE are sometimes also indicators of County Lines involvement.

The school's Personal Development programme supports students, in an age-appropriate manner, to make good decisions and to seek help when they are concerned about themselves or another student, and external agency support is sought where appropriate, including where risky behaviours are identified.

### **Cybercrime**

The school's Personal Development and Digital Literacy programmes are designed to educate students in making good choices and where to go to seek help. The programmes are reactive, in order to respond swiftly to local need, and external agency support is sought where necessary.

### **Domestic abuse**

The Domestic Abuse Act, 2021, introduced the first statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The school recognises that anyone can be a victim of domestic abuse, regardless of sexual identity and orientation, age, ethnicity, socio-economic background or history and it recognises that the impact of domestic abuse can be long-lasting in its impact. The school is committed to supporting students who are impacted by domestic abuse, or abuse within their own relationships, realising that school can be a safe space and therefore an environment where a disclosure may be made by a child. External agency support, including referral to children's social care, is sought in instances of domestic abuse, and in the event that additional wellbeing support is required.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

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

The school engages with Operation Encompass, to ensure that it has up to date information relating to children's home circumstances in relation to domestic abuse. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

### Homelessness

The school recognises the economic impact of Coronavirus on its families, and identifies this as an indicator of risk alongside debt, refugee status, arrears, domestic abuse and other vulnerabilities. For older students, the school recognises that students may be living independently from their families, and so may be at risk of homelessness in their own right.

Referrals are made to the Local Housing Authority where appropriate, and engagement with external agencies, including children's social care, is undertaken where necessary.

### 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

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out;
- A family/pupil already being known to social services in relation to other safeguarding issues.
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable;
  - Finding it hard to sit still for long periods of time (where this was not a problem previously);
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating;
  - Having frequent urinary, menstrual or stomach problems;
  - Avoiding physical exercise or missing PE;

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- Being repeatedly absent from school, or absent for a prolonged period;
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
- Being reluctant to undergo any medical examinations;
- Asking for help, but not being explicit about the problem;
- Talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl's community or country of origin;
- A parent or family member expressing concern that FGM may be carried out ;
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM;
  - Having limited level of integration within UK society;
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman";
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period;
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
  - Being unexpectedly absent from school;
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

### 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.

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)

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- 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.

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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.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our behaviour policy and online safety policy.

### Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

The school recognises that children can abuse other children, and that this can take many forms, both inside and outside of school. All staff are trained in identifying the indicators of peer on peer abuse and addressing instances of inappropriate verbal and physical behaviours, including 'banter,' discriminatory comments and unwanted sexualised comments/harassment. All instances of peer on peer abuse are taken seriously, including matters of inappropriate behaviour/comments, sexual harassment and/or discrimination.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.



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If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

The Department for Education has produced the following documentation for schools: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014224/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf) and this informs the school's practice alongside the 2021 Ofsted Review into Sexual Abuse in Schools and Colleges (<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>).

The school's Personal Development programme supports students, in an age-appropriate manner, to improve their own strategies for keeping themselves safe and seeking help where appropriate.

### Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex;
- Through a group of children sexually assaulting or sexually harassing a single child or group of children;
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours;
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### Serious violence

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Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school;
- Change in friendships or relationships with older individuals or groups;
- Significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male;
- Having been frequently absent or permanently excluded from school;
- Having experienced child maltreatment;
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### Kent and Medway Gang Strategy

This strategy is the first multi-agency commitment to tackle gangs operating across Kent and Medway, and to support those affected by gangs and gang-related crime.

Vulnerable children and young people at risk of criminal exploitation by gangs are also at risk of a whole range of aligned abuse as a result of gang affiliation – from emotional and psychological maltreatment to sexual abuse and debt bondage. They may also be in situations which result in the neglect of their basic needs, live in an unsafe environment, have poor attendance and correspondingly poor long-term outcomes.

For full details please see this link:

[https://www.kscb.org.uk/\\_data/assets/pdf\\_file/0005/81455/Final-Version-Kent-and-Medway-Gangs-Strategy.pdf](https://www.kscb.org.uk/_data/assets/pdf_file/0005/81455/Final-Version-Kent-and-Medway-Gangs-Strategy.pdf)

### Gangs, County Lines, Serious Violence, Crime and Exploitation

Valley Park School recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegations seriously and work in ways that support children and keep them safe.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education;
- Change in friendships/relationships with others/groups;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional wellbeing;
- Significant decline in performance;
- Signs of self-harm/significant change in wellbeing;
- Signs of assault/unexplained injuries.

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### Upskirting

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

### Checking the identity and suitability of visitors

Adapt this section to reflect procedures in your setting.

- 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 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.
- 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.

### Non-collection of children

If a child is not collected at the end of the session/day, we will: check with the student what their end of day arrangements are expected to be, and contact home if these conditions have not been met. Our safeguarding arrangements come into play if we are unable to make contact with the student's primary or secondary contacts.

### Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will: make initial checks, to ensure that they are not on site (e.g. in the wc) and will contact home to notify the primary carer(s). We will alert the senior team and pastoral leads, who will monitor registers and monitor the site.

## Safeguarding and Child Protection Policy

### APPENDIX 5: Safer Recruitment and DBS Checks – Policy and Procedures

#### Recruitment and selection process

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.

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 will 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.
- Sign a declaration confirming the information they have provided is true

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### 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;
- 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;

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- 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. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.
- 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.

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### 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.

Schools with pupils aged under 8 add: 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.

### Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### 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

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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 and Members

All trustees, local governors and members 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.

The chair of the board will have their DBS check countersigned by the secretary of state.

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.

### Staff working in alternative provision settings

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

### Adults who supervise pupils on work experience

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

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

### Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.



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### APPENDIX 6: Allegations of Abuse made against Staff

#### Section 1: allegations that may meet the harms threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she 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.

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

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

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

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

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

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

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

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

#### Definitions for outcomes of allegation investigations

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

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

### Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below;
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate;
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care;
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details;
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate;
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the

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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.

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

### **Additional considerations for supply teachers and all contracted staff**

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

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

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

### **Timescales**

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week;

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- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days;
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

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

### Specific actions

#### Action following a criminal investigation or prosecution

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

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

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

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

#### Individuals returning to work after suspension

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

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

#### Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

#### Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

#### Confidentiality and information sharing

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

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

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

### Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

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

### References

When providing employer references, we will:

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

### Learning lessons

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

This will include consideration of (as applicable):

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

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

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### Non-recent allegations

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

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

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

### Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion;
- Complaint;
- Disclosure made by a child, parent or other adult within or outside the school;
- Pre-employment vetting checks.

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

### Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- Using inappropriate sexualised, intimidating or offensive language.

### Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- Empowering staff to share any low-level concerns;
- Empowering staff to self-refer;
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised;
- Helping to identify any weakness in the school's safeguarding system.

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### Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously;
- To the individual involved and any witnesses .

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

### Record keeping

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

Records will be:

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

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

### References

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

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