



Pulford VA Lower School

Updated April 2020

Child Protection and Safeguarding Policy

Purpose

At Pulford School we recognise:

- Our statutory duty under Section 175 & 157 of the Education Act 2002 to ensure that arrangements are in place for safeguarding and promoting the welfare of children.

We will act in accordance with the following legislation and statutory guidance:

- *The Children Act 1989 & 2004 with statutory guidance in updates, both of these acts are also amended by the Children and Social Work Act 2017, which received Royal Assent on 27 April 2017. The school is also aware of the guidance on the NSPCC learning website*
https://learning.nspcc.org.uk/child-protection-system/england/?_ga=2.255325768.1194475021.1536656271-33443600.1536656271
- *The Education Act 2002 (section 175)*
<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>
- *The Children and Families Act 2014*
- *The Serious Crime Act 2015*
- *The Modern Slavery Act 2015*
- *The Education (Pupil Information) (England) Regulations 2005*
<http://www.legislation.gov.uk/uksi/2005/1437/regulation/6/made>
- *Keeping children Safe in Education (DFE 2019)*
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
This includes updates concerning multi-agency changes; serious violence; Relationships education; upskirting; inspections; Section 128 checks extended.
- *Working Together to Safeguard Children (DfE, 2018)*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf
This has 4 key topics not included previously: children and the court system, where children are appearing as witnesses; children with family members in prison; criminal exploitation of children (County Lines); homelessness.
- *Procedures set out by the Central Bedfordshire Safeguarding Children Board (CBSCB). This will be replaced by local safeguarding partners who will publish reports on local safeguarding practice reviews (Section 17).*
<https://centralbedfordshirelscb.org.uk/lscb-website/professionals/professionals>
- *What to do if you are worried a child is being abused 2015- guide for practitioners*
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- *Information sharing:*
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- *Promoting the Education of Looked-after Children (2014)*
- *Prevent duty - to have due regard to the need to prevent people from being drawn into terrorism – Counter Terrorism and Security Act 2015 (and additional DfE guidance 'The prevent duty: for schools and childcare providers').*
<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

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- <https://www.gov.uk/government/collections/serious-crime-bill>
- Supervision of Activity with Children (2012)
- Children Missing in Education (Sept 16)
http://www.centralbedfordshirelscb.org.uk/assets/1/final_safeguarding_c_and_y_p_who_go_missing_from_home_and_care_8_8_14_bbc_agreed_21.pdf
- Children missing from home or care
<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>
- <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>
- <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>
- <https://www.gov.uk/government/publications/drugs-advice-for-schools>
- The school is aware that the context for safeguarding is key and that the assessment of children takes into account all of their social sphere not just at school:
<https://contextualsafeguarding.org.uk/assets/documents/Contextual-Safeguarding-Briefing.pdf>
- Multi-agency guidance on FGM (April 16);HBA and FM
- The Equality Act 2010 this protects people from discrimination (both direct and indirect) and harassment in various fields on the ground of certain ‘protected characteristics’.
- Our Common Law duty to protect and keep children safe whilst in our care.
- We are also aware of the church of England’s document Valuing All God’s children
https://www.churchofengland.org/sites/default/files/2017-11/Valuing%20All%20God%27s%20Children%27s%20Report_0.pdf

We fully acknowledge our responsibilities for child protection and recognise that through our day to day contact with children, school staff are well placed to identify signs of risk and harm which might arise outside of time spent in school (see appendices for full details). **No policy can fully protect children, so it is the vigilance of staff which is key.** Staff are also aware that they should be prepared to identify children who may benefit from Early Help (providing support as soon as a problem emerges at any point in a child’s life). Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. We aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced

We recognise that for children: high self-esteem, confidence, risk awareness and good lines of communication help to reduce risks. We recognise that for some children school may be the only stable, secure and consistent environment in their lives.

Aim

We aim to provide a safe, secure and consistent environment for all our pupils/students regardless of age, ethnicity/religion, disability, gender/sexuality; one in which they feel supported, valued, respected and listened to. We will do this by:

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1. Establishing a safe environment in which children can learn, develop and have a voice which is listened to.
2. Adopting safe recruitment practices to check the suitability of both staff and regular volunteers and visitors to the school. We will also ensure that procedures are in place to prevent the unsupervised access to children of adults who have not undergone such a checking process.
3. Raising the awareness of children and equipping them with the skills and knowledge needed to keep safe.
4. Having in place procedures for the identification and reporting of cases where harm or risk of harm to a child is suspected and ensuring that all staff are aware of such procedures. Developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns.
5. Supporting pupils who have suffered abuse or who are otherwise vulnerable (for example, children living away from home), where appropriate, in accordance with their agreed child protection plan.
6. Having measures in place to facilitate and promote the safe use of technology. Ensuring that children participate in e-safety lessons where clear standards of behaviour are defined.
7. Raising awareness amongst staff of intimate care issues.
8. What to do when we are concerned about a child
9. Monitoring and evaluating our safeguarding practices and procedures.

Key principles:

- Always see the child first and consider what life is like for the child maintaining a culture of vigilance
- Provide support and intervention at the earliest possible opportunity in the least intrusive way in accordance with Central Bedfordshire LSCB Thresholds Framework
- Have conversations, build relationships and maintain professional curiosity
- Focus on securing improved outcomes for children
- Build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children
- Every child is entitled to a rich and rounded curriculum

When issues arise, Head Teachers should speak out, addressing them internally where possible and engaging in a multi agency response when required in accordance with interagency procedures.

Roles and Responsibilities

Local authorities have overarching responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have a number of statutory functions under the 1989 and 2004 Children Acts which make this clear, and this guidance sets these out in detail. This includes specific duties in relation to children in need and children suffering, or likely to suffer, significant harm, regardless of where they are found, under sections 17 and 47 of the Children Act 1989. The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective delivery of these functions.

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At Pulford School we recognise that all staff, regardless of their role, have a duty to safeguard children and promote their welfare. Staff are encouraged to maintain a ‘professional curiosity’. Our policy applies to the whole school community: all teaching and non-teaching staff, governors, students/pupils and volunteers and visitors working in the school.

All staff should be aware of the guidance issued by Central Bedfordshire Safeguarding Children Board within the Threshold Framework in order to secure support and intervention for children and young people at the earliest possible opportunity in the least intrusive way. This document is integral to safeguarding children in Central Bedfordshire educational establishments and will always be used to underpin decision making.

Although referring concerns to Children’s Social Care via Designated staff (DSL/DDSL) remains the usual process; in line with the statutory guidance *Keeping Children Safe in Education* (2019), staff will be made aware that **anybody can make a referral**. This might for example arise, where a designated staff member is not immediately available, or where a member of staff feels that the actions of a designated person have been insufficient. On occasions when staff do refer to Children’s Social Care directly, they should refer to the Local Authority in which the child is resident (normally Central Bedfordshire). The LA should make a decision within one working day of a referral being made re: course of action to be taken. The referrer should know the outcome. Staff have the responsibility to follow up on the referral if not informed of the outcome by Children’s Social Care. Information will be displayed in staff areas to enable staff to do refer. Forms are stored on the T-shared area of the server although they are filled in online. If the child is felt to be in imminent danger a referral should be made and/ or the police called immediately. If after referral a child’s situation does not seem to be improving the DSL/DDSL or referrer should press for reconsideration.

In addition, the Designated Person for Child Protection (Mr Heather and in his absence Mrs Rees, Mr Webb and Mrs Major) and the Designated Governors Mrs Birtles have extra roles and responsibilities. The school is aware of the changes in legislation in section 3 of the Statutory Framework for the EYFS and the guidance which has changed to legal requirements. Mrs Major is the Safeguarding Lead for the 3+ and is a designated person for the whole school.

We will:

1. Establish a safe environment in which children can learn, develop and have a voice by:

- 1.1 Ensuring that our buildings and site are secured and that, visitors to the school are properly checked and supervised. A risk assessment is carried out for each visitor or volunteer and a DBS check carried out if deemed necessary.
- 1.2 Having a Health & Safety & Security Policy; Fire Risk Assessment; First Aid policy; Acceptable Use Policy ; Learning Support Policy; Critical Incident Policy; Medicine and medical needs policy; Trips policy; a Racial Equality Policy; a policy for dealing with Racist incidents; Disability Equality Policy Anti-bullying policy; Positive handling; Behaviour and Discipline policy incorporating physical intervention policy and procedures and ensuring that they are reviewed regularly and understood by all staff in line with *Safer Working Practice for the protection of children and staff in Education Settings (archived but still useful)*. Pulford ensures that staff adhere to the policies and promote their principles of value, respect and acceptable behaviour amongst our pupils/students.
- 1.3 Ensuring that all staff are risk aware and routinely conduct risk assessments, as appropriate to their individual role and responsibilities and activities undertaken.

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- 1.4 Ensuring that all staff and governors have been made aware of Central Bedfordshire's *Safer Working Practice for the protection of children and staff in Education Settings and Keeping Children Safe in Education* document (September 2019) and work to the guidance contained therein. Staff sign a document/send an e-mail to say that they have read and understood any updates. That students and regular volunteers are aware of procedures outlined in the student and adult volunteer policies.
- 1.5 Following Bedfordshire's LSCB procedures where an allegation is made against a member of staff or volunteer. Where such an allegation is made, the Head Teacher should be notified. He will follow the school policy and the DFE's statutory guidance in Part 4 of Keeping Children Safe in Education. If necessary they will notify the authority's Allegations Manager - tel no 0300 300 8142 or Conference and Review Service on 0300 300 8142). Where such an allegation is made against the Head Teacher, the matter will be referred to the Chair of Governors (currently Paul Whittington) who will likewise follow the same procedure:

<https://www.centralbedfordshirelscb.org.uk/lscb-website/professionals/allegations-against-adults-working-with-children>
- 1.6 Ensuring that the Discipline and Behaviour policy (which incorporates the Physical Intervention policy) and the Positive Handling Policy is understood by all staff.
- 1.7 Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children and that the Whistle-blowing (Confidential) and Parental Complaints Procedure policy are understood by pupils, parents and staff (as appropriate). The Head Teacher will have responsibility for this and also for ensuring that any deficiencies are brought to the attention of the Governing Board. Whistleblowing procedures are reflected in the staff code of conduct. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding Child protection failures internally. Staff can call 08088005000 from 8am – 8pm or e-mail help@nspcc.org.uk.
- 1.8 Establishing and maintaining an environment where children feel safe, valued, are encouraged to talk and are listened to. Student voice plays an important role at Pulford school and to this end the school council, Playground Friends and the 'rainbow bench' all assist to make children feel safe and secure. Within class individual classes have their own ways of dealing with this in the form of: buddies; circle of friends; and within PSHE and 'circle time'. From time to time posters for anti bullying campaigns or organisations such as the NSPCC and childline are displayed.
- 1.9 To recognise that children with SEND have an increased vulnerability and that staff are aware of these risks and vulnerabilities Staff will focus on securing improved outcomes. Every child is entitled to a rich and rounded curriculum to meet their needs.

2. Adopt safe recruitment practices to check the suitability of both staff, governors and regular volunteers and visitors to the school. We will also ensure that procedures are in place to prevent the unsupervised access to children of adults who have not undergone such a checking process. We will do this by:

- 2.1 Following the guidance set out in part 3 of Keeping children safe in education publication (September 2019). References, qualifications and identity will be verified and all documentation kept in a single central record. All staff and regular volunteers

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and visitors will be vetted in accordance with these guidelines. Section 128 checks have been extended to include governors, Key stage leads as well as SLT.

- 2.2 Ensuring that at least one member of the Board of Governors and the Head Teacher have received training on Safer Recruitment Practices (at this time Mr Heather, Mr Webb, Mrs Major, Mrs Birtles, Mrs Howe and Mrs Rees have all undertaken safer recruitment training). As we are a Voluntary Aided school the Governing Board employs our own staff, Mr Webb oversees recruitment and contracts. New staff are DBS checked with Central Bedfordshire.

The school pays full regard to ‘Keeping Children Safe in Education’ (DfE 2019). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the staff and governors which will also include historic GTCE sanctions and European Economic Area (EEA) regulating authority teacher sanctions (annex F).

Mrs Birtles undertakes periodic checking of the Single Central Record along with Mr Webb. She signs off any additions of e.g the latest employees once she has checked them against the SCR. This is kept in hard copy and e-copy.

- 2.3 Ensuring that all staff interviews have at least one person on the panel that has completed safer recruitment training.
- 2.4 Referring concerns about the suitability of staff to work with children and young people to the Disclosure and Barring Service in cases where that individual is believed to have harmed or to pose a risk of harm children or vulnerable adults.
- 2.5 Ensuring that adults involved in the provision to children of extended services and school activities outside of normal school hours are subjected to the same level of vetting and or security arrangements as other staff and volunteers. The school at present does not undertake overseas exchange visits and so those guidelines on DBS checks do not apply.
- 2.6 Ensuring that LSCB procedures are followed including those for managing allegations and concerns regarding staff and volunteers working with young people.
- 2.7 Ensuring that where school premises are used by other bodies both during and outside school hours, the Governing Board will be responsible for seeking assurance that the body concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection. The Lettings policy also states ‘The school will contact the Access and Referral Hub (office hours 03003008585; out of hours – 3308123) if they suspect that the letting or gathering has been used for political purposes, not previously authorised by the head teacher, the dissemination of inappropriate material or other purposes which could be reportable under the new statutory Prevent duties or which contravene current legislation in any way’.

3. Raise the awareness of children and equip them with the skills and knowledge needed to keep safe by:

- 3.1 Including opportunities through the PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse. The school is aware of, and is preparing for, changes to relationships education which will be compulsory by September 2020.



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- 3.2 Ensuring that children know that there are adults in the school whom they can approach if they are worried.
- 3.3 Displaying/distributing appropriate safeguarding materials and information such as NSPCC assemblies.
- 3.4 Following the school's AUP and internet safety policies. The school is aware of the Pan Bedfordshire digital safeguarding advice to schools.

4. Have procedures for the identification and reporting of cases where harm or risk of harm to a child is suspected and ensure that all staff are aware of such procedures. We will do this (in adherence with the guidance set down in *Working Together to Safeguard Children (2018)*; Part 4 of keeping Children Safe in Education; *LSCB Safeguarding Inter-Agency Procedures*:

<https://centralbedfordshirelscb.org.uk/lscb-website/professionals/inter-agency-procedures>

The school is aware of changes to multi-agency working and change from LSCB but until that has taken place in Central Bedfordshire they will continue to work with the LSCB.

- 4.1 Allocating a member of the school's leadership team to the role of lead 'Designated Person' for child protection. This role is currently carried out by Mr Heather. He takes lead responsibility for coordinating all child protection activity within the school. He will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the early help hub, children's social care, health, police etc. He has lead responsibility and management oversight for safeguarding and child protection.
- 4.2 Having at least one named member of staff to deputise in the absence the main designated person. This role is currently carried out by Mrs Rees, Mr Webb or Mrs Major. The Deputy Designated Safeguarding Leads are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility
- 4.3 Providing time and support for these roles.
- 4.4 Ensuring that appropriate training for staff performing this role is enabled and updated as necessary or in any case, every 2 years as a minimum. All staff receive appropriate safeguarding and Child Protection training regularly and receive updates via briefings and staff meetings. New members of staff are given induction training and those with English as a second language or low literacy skills are offered extra time with a senior member of staff to go through the policies and documents such as 'Keeping Children Safe in Education'. A working knowledge of The Early Help Assessment process (EHA) is also useful as this is a standardised approach to assessing children and young people's needs and deciding how they should be met. The EHA is a key element to deliver more effective early intervention and prevention and is a tool for the identification and initial assessment of children and young people considered to be in need of additional support
<https://www.centralbedfordshirelscb.org.uk/lscb-website/professionals/early-help>

Staff are expected to be involved in the implementation of individual education programmes, early help assessments and plans, child in need plans and interagency child protection plans.

They should also be equipped to recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the LSCB.

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- 4.5 All staff and volunteers must be aware that the main categories of abuse are:
- Physical abuse
 - Emotional abuse
 - Sexual abuse including child sexual exploitation
 - Neglect

These categories are described in more detail in Appendix 5 including specific safeguarding issues such as child sexual exploitation and Female Genital mutilation (FGM), forced marriage (FM), honour based abuse (HBA), preventing radicalisation. The LSCB has comprehensive procedures for dealing with these crimes (FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014).

http://www.bedfordshirelscb.org.uk/assets/1/pan_beds_fgm_fm_hbv_strategy_final_september_2016.pdf

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting, upskirting (see appendix 5.23).

New safeguarding strategies include: hate; mental health; missing children and adults; relationship abuse. The signs indicating the possibility of abuse are described in Appendix 6. The abuse may be instigated by one or more adults, and/or other children and young people. Children with SEND are particularly vulnerable.

If any member of staff has a concern that a child in their care has suffered any of these forms of abuse, they must report their concerns to, and seek advice from the Designated Safeguarding Lead (DSL), or in his/her absence, the Deputy Designated Safeguarding Lead (DDSL), as soon as possible, and never later than the end of the working day. If there is concern as to whether it is safe to allow the child to go home that day, then all effort must be made to inform the Designated Safeguarding Lead (DSL) immediately so that the Access and Referral Hub can be contacted and/or the police (see appendix 1 useful numbers) and the necessary protective measures implemented. If this is not possible then anyone can undertake a referral. Assessment and threshold guidance can be found at : <http://www.bedfordshirelscb.org.uk/lscb-website/professionals/the-importance-of-thresholds> .

A child may disclose sensitive information at any time of the day, and in particular this may occur outside of normal lesson time, e.g. break periods or during before/after school club sessions. It is therefore imperative that **all** the staff are aware of the signs and behaviour which **may** indicate abuse.

All staff must:

- Recognise that a disclosure may come directly from the child, or from a third party, e.g. friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of symptoms and knowledge of possible indicators of abuse.
- Take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour.

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When receiving a disclosure from a child that he/she has been abused in some way the member of staff must follow the correct procedure:

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light.
 - Listen to what is being said without displaying shock or disbelief.
 - Not make false promises which may not be able to be fulfilled and do not promise confidentiality. If the child asks that information is kept secret, it is important that you tell the child in a manner appropriate to the child's age/stage in development that you cannot promise complete confidentiality – instead you must explain that you may need to pass information to other professionals to help keep the child, or other children, safe. However, staff need to maintain an appropriate level of confidentiality sharing information on a 'need to know' basis.
 - Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Use the TED principles – Tell; Explain; Describe.
 - Not criticise the alleged perpetrator.
 - Reassure the child that what has happened is not his or her fault.
 - Stress that it was the right thing to tell.
 - Explain what has to be done next and who has to be told.
 - Find out just enough to be sure of the need to refer, and keep any questions open rather than closed. Education is a referrer, not an investigative agency for child protection matters. An incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or repeated recital.
 - Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned.
 - Sign and date the record of the disclosure.
- 4.6 Having a nominated governor responsible for child protection and safeguarding, who will review our safeguarding policies, procedures and practices regularly and be the link person between the designated member of staff for child protection and the school governing Board. This role is currently carried out by Mrs Birtles. Minutes from the meetings are kept in the child protection file, the key to which is kept by the head teacher.
- 4.7 Ensuring that every member of staff (employed directly or indirectly via another organisation; permanent and temporary), volunteer and governor is aware of this policy and their own role in safeguarding and promoting welfare and the identity and role of the designated person/s. All staff and governors will be given a copy of this policy and volunteers

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will be made aware of the procedure in the 'Adult Volunteer helper and Work Experience Students in school policy'. Anyone can make a referral following the procedures.

- 4.8 Having processes in place to ensure that all new staff receive safeguarding training/briefing appropriate to their role, as part of their induction and thereafter have access to refresher training as required or in any case, every 2 years as a minimum (last refresher 2015 with PREVENT course and updates January 2016,17,18,19 and new refresher course booked for January 2020).
- 4.9 Requiring **all** staff and volunteers, to report **any** safeguarding concerns to the Designated Person for Child Protection, (Mr Heather and in his absence Mrs Rees or Mrs Major), regardless of whether or not they feel that the concern is either serious or substantiated. Any concerns should be raised immediately or as soon as is reasonably practicable and accompanied by signed, dated, written record. This expectation will be communicated through regular training. The concern will then be placed in the school's safeguarding file for that child (or create one if necessary).
- 4.10 Enabling the Designated person for Child Protection to make decisions regarding the action to be taken following a concern being brought to his/her attention (see 4.12). Working Together to Safeguard Children 2013 introduced a single assessment framework for Children's Social Care, which replaced initial and core assessments, this was then updated in 2015. http://centralbedfordshirechildcare.proceduresonline.com/chapters/p_ch_fam.html (Where appropriate, this may follow consultation; for example with Children's Social Care or the Authority's safeguarding advisors).
Ensuring that where there is a suspicion that a child might have suffered or be at risk of suffering significant harm, the matter will be referred to Children's Social Care in accordance with *LSCB Safeguarding Inter-Agency Procedures online*.
<http://bedfordscb.proceduresonline.com/index.htm> This will normally be done via the Designated Person/s for Child Protection unless they are not available and to wait for them to become available would pose an unacceptable delay. However, anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point. The social care team will then escalate according to flow chart 4 P.38 of Working together to Safeguard children 2018
<T:/Safeguarding/Working Together to Safeguard Children-2018.pdf>
- 4.11 Ensuring that where concerns remain about the welfare or safety of a child following referral to/intervention by Children's Social Care, these concerns are shared with Children's Social Care & recorded in writing by the Designated Person. Where the Designated Person believes that a decision made by another professional exposes a child to risk/continuing risk of significant harm, they will ensure that the fact that they disagree with that decision is recorded; both by them and where possible on relevant minutes and case papers held by other professionals involved. They will also escalate the matter, as per the Local Authority Protocol.
- 4.11.1 Making the Designated Person/s for Child Protection responsible for creating and maintaining written records in respect of all children for whom safeguarding concerns have been identified, regardless of whether there is a need to make an immediate referral. These confidential records, which will be kept securely and separate from the main pupil file, will include a chronology of events. The pupil's main file will indicate the existence of a separate safeguarding/child protection file by a red dot on the cover.



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Ensuring that in line with early intervention principles, where the threshold of significant harm is not met but a child is believed to be a ‘child in need’ of additional support/services (under section 18 of the Children Act 1989), we either provide that support or refer the child to other agencies or Access and Referral Hub as appropriate. The designated person will use the threshold criteria published by LSCB.

http://centralbedfordshirechildcare.proceduresonline.com/pdfs/threshold_criteria.pdf . If the thresholds are met, then an Early Help Assessment will be made

www.centralbedfordshire.gov.uk/eha. The Designated Person will engage with families and ensure that parents/carers and young people are fully involved in completing an EHA. The Early Help Assessment (EHA) is a standardised approach to assessing children and young people’s needs and deciding how they should be met. The EHA is a key element to delivering more effective early intervention and prevention and is a tool for the identification and initial assessment of children and young people considered to be in need of additional support. If the Early Help Assessment has resulted in a plan that is enabling the child to achieve their full potential then a referral to Social care may not be necessary, if however, a referral does need to be made then a BIC 100 form will be completed for referral to Social care. This is all done on-line and hard copies are e-mailed once submitted

<https://www.centralbedfordshire.gov.uk/officeforms/Bic100.ofml>

The lead professional will also decide if a referral to (MARAC) - Multi-Agency Risk Assessment Conference for those at risk of harm from [domestic abuse](#) is necessary (see appendix 4).

- 4.12 The Designated Person will ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out our obligations in the school prospectus and publishing our policy on the website. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Children’s Social Care Services. It will be made clear that this is a legal obligation and not a personal decision.
- 4.13 Providing and, as appropriate, soliciting additional support from other professionals, for all vulnerable pupils/students including those with disabilities, minority status and those with a history of abuse.
- 4.14 Ensuring that issues of confidentiality are understood by all staff, including the need not to offer confidentiality in certain situations; that safeguarding information should be treated as confidential and only shared as part of the agreed school and Central Bedfordshire Safeguarding Children Board protocols; All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals; Staff / volunteers who receive information about children and their families in the course of their work shall only share that information only within appropriate contexts.
- 4.15 Developing effective links with agencies which provide support to our vulnerable pupils and co-operate as required with their enquiries regarding child protection matters.
- 4.16 Providing advice and support for all staff members who are dealing with a pupil for whom their concerns are stressful and upsetting.
- 4.17 Supporting the Authority’s policies on school attendance and children missing education, also adhering to the missing children procedures <https://centralbedfordshirescb.org.uk/lscb-website/professionals/missing-and-absent> in the case of children who run away or go missing.

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CME tracking sheets used if appropriate. The Statutory Guidance on Children Who Run Away or Go Missing from Home or Care 2014 is issued under Section 7 of the Local Authority Social Services Act 1970 and states that local authorities must offer an independent return interview to all children who run away or go missing from their family home or care.

Checks are made on children who are absent and parents are requested to phone in if a child is sick. At least 2 emergency contact numbers are kept at school to facilitate this. Children leaving at unusual points in the term are followed up with the receiving school in line with protocol. Completed safeguarding forms/records will be kept for the duration of the child's school career and where a child changes school the forms/records will be copied to the Designated Safeguarding Lead (DSL) at the receiving school. The school will retain a receipt for the records signed by the receiving school. The information contained will be regarded as confidential. However, sharing of information between practitioners and organisations is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect. The school follows the advice on Information sharing March 2015 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf Any request for access to the information by non-Central Bedfordshire Safeguarding Board agencies (e.g. Solicitor, investigating agent) will be referred to the Head teacher/Child Protection Designated Safeguarding Lead (DSL) who is advised to seek legal advice before acting.

4.19 Safeguarding in specific circumstances: Children who are vulnerable to extremism

- Pulford seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- In accordance with the Prevent Duty placed upon the school by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism. Pulford is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- Pulford values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to this school is fundamental British values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and the rights of all Women and Men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.

4.20 Risk reduction

- The school governors, the Head Teacher/ Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, worship policy, the use of school premises by external agencies, integration of children by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy



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- This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local safeguarding children board.
- In accordance with the Prevent Duty, Mrs Rees is the Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.
- When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person. If a child or Young Person is thought to be at risk of radicalisation, advice will be sought from the Early Help Hub, and if advised, information will be shared with the Channel Panel using the Early Help Assessment form.
- In all cases, in accordance with advice provided from the Early Help Hub the school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalisation.
- If the school are concerned that a child may be at risk of significant harm in relation to radicalisation or involvement in violent extremism a child protection referral will be made to the Multi Agency Safeguarding Hub.

4.21 Safeguarding Children in Specific Circumstances: Female Genital Mutilation / forced marriage / Modern Day Slavery

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.
- FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this.
- Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the school's safeguarding reporting procedures. A Teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.
- Those failing to report such cases will face disciplinary sanctions.
- If the school are concerned that a child / young person has experienced or is at risk of FGM a Child Protection referral will be made to the Multi Agency Safeguarding Hub in accordance with interagency procedures produced by the LSCB. In addition, all teachers will follow mandatory reporting duties.
- Further information regarding FGM can be found in Appendix five
- A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights
- The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example,

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when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

- The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry This includes:
 - Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
 - Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
 - Breaching a Forced Marriage Protection Order
- Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol).
- These crimes include holding a person in a position of slavery , servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

4.22 Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
- Forced marriage and illegal adoption (if other constituent elements are present)

4.23 Safeguarding Children in Specific Circumstances: Peer on Peer abuse

- The school recognises that children can abuse other children and such behaviours are never viewed simply as 'banter' or as part of growing up. We recognise that peer on peer abuse can take many different forms such as:
 - Cyber-bullying
 - Sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as Youth Produced Sexual Imagery)
 - Sexual assault
 - Sexual violence or harassment
 - Sexually harmful or problematic behaviour
 - Gang initiation or hazing type violence

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The school will follow Sexual Violence and Sexual Harassment guidance (DfE, 2017) when responding to such issues alongside local interagency procedures and the Harmful Sexual Behaviours strategy. This includes responding to any reports in a child centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children. The school will respond to reports of sexual violence and sexual harassment on a case by case basis considering the LSCB thresholds framework, whether a criminal offence may have been considered and whether a report to the Multi-Agency Safeguarding Hub is necessary. The school will also consider seeking specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

4.24 Safeguarding Children in Specific Circumstances: Sexualised behaviours

- Where children display sexualised behaviours, the behaviours will be considered in accordance with the children’s developmental understanding, age and impact on the alleged victim. Tools such as Brook Traffic Light Tool will be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child/ren receive the right support at the right time either via an Early Help response or referral to Children’s Social Care
- In all cases of peer on peer abuse the school will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response consistent with the LSCB Thresholds Framework.
- Where necessary, the school behaviour policies will be invoked and any sanctions applied will be consistent with these procedures
- Where issues indicate that a criminal offence may have been committed a report will be made to Bedfordshire police

4.25 Safeguarding Children in Specific Circumstances: Gang related violence

- The school recognises the risks posed to children in relation to involvement in gang related activity which may be street gang, peer group or organised crime. Young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition children may experience violence as part of an initiation or hazing practices.
- The school understands that Early Help can be crucial in the early identification of children who may need additional support due to gang related activity and as such will provide an early help response when concerns are raised about indicators of gang activity.
- If, however information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made to the Multi Agency Safeguarding Hub within Children’s Social Care.
- Where there are concerns that a child or young person may be, or is at risk of becoming involved in gang related activity, a referral will be made to the MAG panel in accordance with Local procedures as part of the safeguarding response.

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- The school is aware of the concept of Contextual Safeguarding which has been developed by Carlene Firmin at the University of Bedfordshire to inform policy and practice approaches to safeguarding adolescents. Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

4.26 Safeguarding Children in Specific Circumstances: Youth Generated Sexualised imagery

- The school recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the UK Council for Child Internet Safety in relation to how we respond to incidents.
- In all cases where an incident of youth produced sexual imagery is reporting the following actions will be undertaken:
 - The incident should be reported to the Designated Safeguarding Lead as soon as possible.
 - The Designated Safeguarding Lead should hold an initial review discussion or meeting with appropriate school staff.
 - There should be subsequent interviews with the young people involved (if appropriate).
 - Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
 - At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children’s social care and/or the police immediately.
- An immediate referral will be made to the Police and Social care in the following circumstances:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
 - the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
 - The imagery involves sexual acts and any pupil in the imagery is under 13
 - There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming



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- If none of the above applies the school may choose to deal with the incident without involving the police or social care. This will usually be the case where the Designated Safeguarding Lead is confident that they have enough information to assess the risks to the pupils involved and the risks can be managed within the school pastoral support and disciplinary framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren.
- The school will pay due regard to the Department for Education guidance: Searching, Screening and Confiscation advice.
- Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the designated safeguarding lead will respond to an incident based on what they have been told about the imagery.
- All incidents will be recorded.

4.27 Safeguarding Children in specific circumstances: Child Sexual Exploitation

- Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (DfE, 2017)
- Child sexual exploitation can occur through use of technology without the child’s immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.
- The school recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators.
- The school recognises that there are various ‘models’ of CSE which include but not limited to:

Gangs and groups	Boyfriend/Girlfriend model
Peer on Peer	Familial
Online	Abuse of authority
- Where concerns are identified in relation to Child Sexual Exploitation the LSCB thresholds framework will be consulted in order to ensure the child receives support at the earliest possible opportunity.
- An Early Help multi agency response may be initiated by completing an Early Help Assessment form and engaging with the Early Help Hub or Stronger family’s team. Where parental consent cannot be obtained, advice will be sought from the Early Help Hub



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- If a child is thought to be at risk of significant harm through child sexual exploitation a referral will be made to the Multi Agency Safeguarding Hub within children’s social care.
- In all cases intelligence will be shared with Bedfordshire Police using the information sharing form which will also be copied to the Single Point Of Contact for CSE within Central Bedfordshire Borough Council

4.28 Children In Specific Circumstances

- Further guidance in relation to safeguarding children in specific circumstances can be located in the Central Bedfordshire Safeguarding Children Board / Central Bedfordshire Borough Council procedures as listed below
 - Abuse Linked to Spiritual Belief
 - Child Sexual Exploitation
 - Safeguarding Children vulnerable to Gang Activity
 - Supporting individuals vulnerable to violent extremism
 - Private Fostering
 - Children missing from home or care
 - Children missing education
 - Children of Parents who Misuse Substances
 - Children of Parents with Learning Difficulties
 - [Working](#) with parents/carers with mental health problems
 - Working with parents/carers with disabilities
 - Disabled Children
 - Protocol for dealing with domestic violence when children are involved
 - Online – Children Exposed to Abuse through the Digital Media
 - Fabricated or Induced Illness
 - Female Genital Mutilation
 - [Forced Marriage](#) / Honour Based Violence
 - Modern Day Slavery / Human Trafficking
 - Serious violence
 - Upskirting
 - Criminal Exploitation of children across county Lines
 - Practice Guidance & Procedures to distinguish between healthy and abusive sexual behaviours in children and young people
 - Safeguarding children who may have been trafficked
 - Protocol & Guidance; Working with Sexually Active Young People
 - Working with hostile, non-compliant clients and those who use disguised compliance



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4.29 Unusual circumstances: In specific extreme circumstances such as the school being partially closed due to pandemic such as COVID 19 etc. the SLT will rotate duties to ensure that there is a designated Safeguarding Lead on site at all times. In the unlikely event of all DSL's being unwell/unavailable at the same time, measures will be put in place to ensure that they can be contacted at home. Staff are aware, however, that anyone can refer depending on the circumstances. Staff will be aware of particular vulnerabilities of individuals and the need for vigilance in such extreme circumstances. Measures will be put in place to ensure that vulnerable families not attending school are safe and well at these times. Children and online safety away from school and college. It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police. Online teaching should follow the same principles as set out in the code of conduct. Pulford School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. **Staff making telephone calls to check on vulnerable children or to help children with home learning using their home phones should dial 141 first to prevent caller ID being recorded. If online lessons are delivered by staff the guidance below should be considered:**

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- ~~The live class should be recorded so that if any issues were to arise, the video can be reviewed.~~
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms provided by Pulford School to communicate with pupils
- Staff should record, the length, time, date and attendance of any sessions held.

- 5. Support pupils who have suffered abuse or who are otherwise vulnerable (for example, children living away from home), where appropriate, in accordance with their agreed child protection plan by:**
- 5.1 Maintaining close communication between the Designated Person and allocated social worker and ensuring that the social worker will be informed of any issue that gives cause for concern.
 - 5.2 The Head Teacher having responsibility for ensuring that sufficient resources and time are allocated to safeguarding and that staff are released to participate in safeguarding processes, core groups and meetings (especially child protection case conferences).
 - 5.3 Ensuring (through the Designated Teacher for Child Protection) that the attendance of any child subject to a child protection plan, or otherwise believed to be at risk of harm, is closely monitored and completing any necessary activities.
 - 5.4 Belonging to 'Relay' a Central Bedfordshire initiative which focuses on early reporting to schools when a child or young person has been involved in a domestic abuse incident. Upon receipt of a police referral, the Relay Support Officer is able to liaise with the nominated Key Adults within each respective school and share information about the child/young person who has witnessed or been subject to domestic abuse. The Key Adult then shares the information with relevant staff and they jointly assess what type of support (silent or overt) needs to be offered to the affected child or young person.

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- 5.5 Ensuring that where there are concerns about the absence from school of a child for whom there are child protection concerns, the office manager, under the direction of the Designated Person, will bring the absence to the attention of the Education Welfare Service. In these circumstances, the Education Welfare Officer will prioritise a visit to the child's home.
 - 5.6 Notifying the Fostering Duty Desk when children come to our attention as being cared for in 'private fostering arrangements' in accordance with advice from LSCB - Fostering Duty Officer on **0300 300 8181** or by email fostering@centralbedfordshire.gov.uk. (See appendix 2 for definition of 'private fostering')
 - 5.7 Making the Designated Person/s for Child Protection responsible for making arrangements to ensure that a copy of a pupil/student's safeguarding/child protection file (where one exists) is securely transferred in a timely fashion to the designated person at the receiving school/college when a pupil/student transfers. This file will be transferred separately from the main pupil record.
 - 5.8 Ensuring that where a child has an allocated social worker, the Designated Person takes responsibility for notifying the social worker or their office, of any change in that child's circumstances, including any changes to schooling arrangements.
 - 5.9 Ensuring that if a child also has SEND that they have additional mentoring and access to support. The school has a culture of listening to, and hearing, the voice of the child.
 - 5.10 When the school is considering excluding, either fixed term or permanently, a vulnerable child and / or a child who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, a risk assessment must be completed prior to convening a meeting of the Governing Body.
- 6. Having measures in place to facilitate and promote the safe use of technology by:**
- 6.1 e-Security: keeping the electronic data we hold about pupils and families secure by password protection for access to systems, secure data transfer by County supported systems (such as anycomms) and following guidelines as laid down by Central Bedfordshire Council.
 - 6.2 e-Safety: Promoting e-safety awareness amongst children and their parents/carers by specific teaching of safety in ICT lessons, awareness evenings for parents, combating cyber – bullying as outlined in the appendices to the Anti-bullying and Harassment Policy, Internet Policy, AUP, parental signature agreeing to internet use on first starting at the school and ensuring all members of the school community know their access rights and responsibilities in using ICT. Children are not allowed mobile phones in school, but staff should be aware that many will have them at home. Children need to be taught the reasons why schools have filters to keep children safe and that when they use mobile data they will have none of that security <https://www.thinkuknow.co.uk/>
 - 6.3 Having an Acceptable Use Policy in relation to the use of technology in the school and which contains the detail of how we will achieve e-security and promote e-safety. The school follows the ICO's (Information Commissioner's Office) advice on data protection and photographs – 'Photo's taken for purely personal use are exempt from the data protection act'. Therefore, parents at this school are allowed to take pictures of sports days and plays etc for personal use, this does not include social networking sites such as Facebook without the express permission of those people recognisable in the view finder. Parents should take

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care not to add identifiable data to images. Parents sign an agreement to allow children to be photographed in school for a variety of purposes such as tracking progress and the school prospectus. If a child's parents do not sign this agreement the child must be removed by staff from situations where their photograph may be taken.

6.4 Acceptable use of Mobile telephones / social media:

We recognise that the vast majority of adults and an increasing number of children use mobile phones regularly as a primary communication tool and do so in a responsible manner. This part of the policy is to safeguard staff and the whole Pulford community and promote a professional teaching and learning environment.

Mobile technology can contribute positively to support the creation of a safe and secure environment as well as having the potential for misuse that can detract from a safe environment.

Some examples that would be relevant would be-

Staff using mobile phones to communicate during a lockdown

To support medical emergencies

To allow communication from other schools in the event of an emergency closure.

Additionally in a drive to improve internet security a code delivered to a mobile device is increasingly being utilised in order to verify credentials.

Pulford School has therefore developed the following code of conduct to inform staff and visitors of acceptable procedure.

a) As a general rule staff and visitors are not permitted to use mobile phones for personal use when children are present other than for Lockdown or a medical emergency.

b) Staff are permitted to take photographs on mobile devices. However, any photographs taken should be to support teaching and learning, for communication with parents or approved external agencies, or to aid a medical emergency. Any images not stored on the school network should be deleted as soon as is professionally practical. Images must not be uploaded to the public domain without permission.

To ensure transparency **all staff are instructed to challenge the use of phones when children are present** and report any concerns to the safeguarding leads.

c) Staff must take additional care when accompanying children swimming, undertaking intimate care and on residential trips. Any equipment capable of video or photography must not under any circumstances be used during swimming, intimate care duties, in children's bedrooms, showers or toilets unless it is necessary to contact the emergency services.

d) Parents are permitted to use mobile phones and similar devices to photograph/ video school events such as shows and sports day. They should not post any images in the public domain without the express permission of those people recognisable in the view finder. Parents should take care not to add identifiable data to images.

e) Children are not permitted to have phones in school.

Social media:

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Facebook, Twitter, WhatsApp etc are great for keeping up with friends and family but staff and volunteers are warned to be wary and follow the simple guidelines at:

<https://www.childnet.com/ufiles/Social-Media-Guide-teachers-and-professionals.pdf>

To protect yourself from unwelcome attention online the following have been suggested for Pulford staff: Lock your account to private and only have ‘friends’ not ‘friends of friends’. Consider using your middle name instead of surname; use an appropriate profile picture. Don’t tag yourself or others without permission. Please ask your friends not to tag you these can lead to posts being seen by a far wider audience than you realise. If you are a member of staff and a parent, be particularly mindful of what you post and how wide your ‘circle of friends’ is. Remember children also look at their parents’ Facebook page. Don’t get involved in discussions online which make you uncomfortable – take a screenshot and discuss with school as soon as possible – Professionals Online Safety Helpline (POSH) can be useful – 03443814772 (saferinternet.org).

Staff should make reasonable restrictions on their account to protect themselves and others. They should manage their online reputation carefully and not say anything about school or specific incidents.

Remember you are only as private as your most public friend. Your humour may not seem humorous to someone who does not know you so well and it may well be taken the wrong way. Don’t bring yourself or your school into disrepute #BeAware – tweets can be re-tweeted many times and be impossible to stop. Check how secure your reputation is – google yourself occasionally and see what comes up, take appropriate action to tighten your privacy settings as necessary. Social media sites often update their privacy settings so revisit your settings regularly anyway.

Other useful sites include www.saferinternet.org.uk as well as www.childnet.com

- 6.5 Conducting, through the Governing Board, an annual review of the school’s Acceptable Use Policy.
- 6.6 Ensuring that all members of staff with access to ICT systems are responsible for taking the appropriate steps to select and secure their passwords.
- 6.7 Making staff and pupils/students aware that all school ICT activity and on-line communications may be monitored, including any personal and private communications made via the school network.
- 6.8 Conducting an annual assessment of information risks, which will be reported to the Governing Board.
- 6.9 Making all staff and pupils aware that they have a responsibility to report e-safety or e-security incidents.
- 6.10 Establishing that all staff and pupils know that incidents are reported to Mr Heather who will investigate them and if necessary refer on. Incident records will be reviewed regularly and any outstanding actions delegated, by the Senior Leadership Team at a minimum frequency of once per term. Through this review process, management shall update the risk assessment in light of new incidents as appropriate.
- 6.11 Reviewing this log with the Safeguarding Governors at their regular visits and informing them of any actions/ action plans.



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7. Intimate Care

We believe that all children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example, assistance with toileting or removing wet/soiled clothing). We will ensure this by:

- 7.1 Having a care plan or SEND support plan which is agreed with parents for all children who require intimate care on a regular basis. Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. Parents are asked to sign the ‘procedure for toileting accidents’ form in their joining pack. Where possible the child will be changed by a member of staff of the same gender, although in a predominantly female staff, this is not always practical. Regard will be given to any cultural preference stated. When assistance is required staff should ensure that another appropriate adult is aware of the tasks to be undertaken.
- 7.2 Ensuring that children with additional vulnerabilities (which may arise from the physical disability or learning difficulty) are additionally protected by recording these vulnerabilities in their care plan which is negotiated, agreed and recorded by the school in partnership with parents and seeking, where appropriate the views of the pupil. This plan will be reviewed regularly.
- 7.3 Ensuring that all adults carrying out these tasks have undertaken safeguarding training and understand the need to report concerns about physical changes such as marks, bruises, soreness etc. This would also include awareness of school policy such as not carrying mobile phones with cameras when carrying out intimate care.
- 7.4 Staff will make other staff aware of the tasks being undertaken and record the date, time and member of staff informed on a simple chart.
- 7.5 Staff will explain to the child what they are going to do.
- 7.6 Staff will consult with colleagues and parents/carers where any variation from agreed procedure/care plans is necessary and record it.
- 7.7 Equipment will be kept securely in a labelled box in the disabled toilet. In case of assistance being required this area has an emergency bell cord. Gloves will be worn by staff at all times and an apron if necessary. All equipment will be wiped down after use with disinfectant wipes. Soiled nappies will be secured in nappy bags along with other soiled equipment and disposed of in a separate, lidded and labelled, container. Soiled clothes will be securely wrapped in a plastic bag and returned to parents. All procedures undertaken will be done in the spirit of ‘in loco parentis’ with particular care given to preventing infections, for example, girls being cleaned from front to back. Both child and adult will always wash hands afterwards. The record chart will be filled in as soon as possible afterwards and any necessary deviations from the care plan communicated to parents and other relevant staff.

8 What We Do When We Are Concerned About A Child

- All concerns will be viewed alongside the LSCB Thresholds Framework in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way. The school also places due regard to the guidance contained in ‘What to do if you are worried a child is being abused’, 2015.

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- If, in consultation with the LSCB Thresholds Framework the level on concern sits at Level 2 or 3 an Early Help Assessment should be completed with the consent of the parent / carer. Early help may also be provided on a single agency basis by the school, or additional support or advice for this work may be sought from the Early Intervention Hub / Stronger Families team as a multi-agency response. In cases where it is not possible to obtain consent from the Parent / Carer the school will seek advice from the Early Help Hub.
- The school will review each case to ensure that any support or intervention provided has impacted positively on the welfare / safety of the child or young person and that improvement is sustained.
- In the event that provision of Early Help has not led to improvements for the child / young person, or concerns escalate, the school will follow the step-up procedures published by the LSCB
- In consultation with the LSCB Thresholds Framework, if the concerns about the child or young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Multi Agency Safeguarding Hub. The parent will be informed of the referral unless informing the parent may place the child / young person at increased risk of harm.
- In the event of a professional disagreement in relation to a specific concern, the school will follow the LSCB procedures for resolution of professional disagreements, also known as escalation procedures.

8.1 Involving Parents / Carers

In general, we will discuss any safeguarding and child protection concerns with parents / carers before approaching other agencies, and will seek their consent to making a referral to another agency. Appropriate staff will approach parents / carers after consultation with the Designated Safeguarding Lead. However there may be occasions when the school will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

Parents / carers will be informed about our safeguarding policy through the website.

8.2 Multi-Agency Work

- We work in partnership with other agencies in the best interests of the children. The school will, where necessary, liaise with the school nurse, initiate an Early Help Assessment, and make referrals to children’s social care. Referrals and contacts should be made by the Designated Safeguarding Lead to either the Early Help Hub, or the Multi Agency Safeguarding Hub depending on the level of need. Where the child already has a social worker, the request for service will go immediately to the social worker involved, or in their absence to their team manager or Duty Worker.
- We will co-operate with any child protection enquiries conducted by children’s social care: the school will ensure representation at appropriate inter-agency meetings such as team around the family meetings, initial and review child protection conferences, together with core group meetings.
- We will provide reports as required for these meetings in accordance with the LSCB interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.



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- Where a child is subject to an inter-agency child protection plan, child in need plan or early help assessment, the school will contribute to the preparation, implementation and review of the plan as appropriate.
- If a child is subject to a referral to a multi-agency safeguarding panel such as MARAC, MAGPAN or CHANNEL the school will contribute to such arrangements.

8.3 Responding To An Allegation Or Concern About A Member Of Staff

- The school will comply with the LSCB procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances
- This procedure should be used in any case in which it is alleged that a member of staff, governor, visiting professional or volunteer has:
 - Behaved in a way that has harmed a child or may have harmed a child;
 - Possibly committed a criminal offence against or related to a child; or
 - Behaved in a way that indicates s/he may pose a risk of harm to childrenAlthough it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children.
- All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately. Allegations or concerns about colleagues and visitors must be reported direct to the Head Teacher / Principal unless the concern relates to Head Teacher / Principal. If the concern relates to the Head Teacher / Principal, it must be reported immediately to the Chair of Governors. Alternatively concerns can be reported directly to the Local Authority Designated Officer (DO) in children's social care, who will liaise with the Chair of Governors and they will decide on any action required.
- If the Head Teacher / Principal are not available the member of staff should report their concerns to the most senior member of staff available who will make contact with the DO and discuss the concerns. Contact into the DO should happen at the earliest possible opportunity and within 1 working day.

8.4 The designated officer (formerly known as the LADO) can be referred to on 0300 30008142 or lado@centralbedfordshire.gov.uk.

- The DO (also known in Central Bedfordshire as the Allegations Manager) may request a referral, if this is requested the referral will be completed and submitted within 1 working day.
- The school will engage with the DO at all stages of the management of the allegation / concern and comply with the Statutory Guidance contained within Keeping Children Safe in Education (2019) and the local procedures published by the LSCB. In this regard, the school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered. Due consideration will be given to the view of the DO in relation to suspension or in-work safeguards while a matter is investigated.
- Should the school dismiss a member of staff/volunteer as a result of a substantiated allegation, or should a member of staff/volunteer resign before an investigation has been completed, in accordance with Statutory Duty a referral to the Disclosure and Barring Service will be made. If the member of staff is engaged in teaching work, the school will in accordance with published guidance from the Department for Education consider whether a referral to the National College of Teaching and Leadership (NCTL) should be made.

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- The school will adhere to the Statutory Guidance contained within Keeping Children Safe in Education (2019) with regard to record keeping, references and compromise or settlement agreements.

If a member of staff, student or volunteer has any concerns about poor, unsafe practice or failures of the safeguarding regime they are encouraged to raise this with the Head Teacher, Senior Leadership Team or Governing Body following the Whistle Blowing Procedures of the school.

The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available 8:00 AM to 8:00 PM, Monday to Friday and email help@nspcc.org.uk.

9. We will monitor and evaluate our safeguarding practices and procedures in line with this policy by:

- a) Ensuring accountability by placing ultimate responsibility for safeguarding and this policy with the Governing Board and responsibility for the implementation of this policy with the Head Teacher.
- b) Ensuring that staff are made aware of particularly vulnerable groups of children such as CLA or Previously Looked after children and those with SEND.
- c) Ensuring that the Designated Governor for Safeguarding has termly meetings with the Designated Member of Staff for Child Protection, in order to monitor and assess the effectiveness of the school’s response to safeguarding and promoting welfare, in line with this policy. As necessary, action plans will be formulated to address areas for development.
- d) Identifying and responding to new/revised guidance issued by government bodies, the Local Safeguarding Children Board and the Local Authority as set out in the appendices.
- e) Reviewing this policy on an annual basis.
- f) This policy should be read in conjunction with the Learning support Policy; the adult volunteer policy; the behaviour and positive handling policy; anti-bullying policy; whistleblowing; Managing allegations document; the children missing education procedure document; the health, safety and security policy; data encompassing policy; the staff, parent and governors codes of conduct; internet safety and AUP.

Policy endorsed by the Governing Board on

SignedChair of the Governing Board

Equal Opportunities

All young people will be treated equally, regardless of race, creed or gender.
The policy will be applied regardless of culture, faith or belief.

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Appendix 1

USEFUL NUMBERS

The DO (also known in Central Bedfordshire as the Allegations Manager) oversees investigations into allegations and concerns against adults who work with children and young people in both a paid and voluntary capacity.

The criteria for DO intervention is where the behaviour of an adult has resulted in a child being harmed or at risk of harm; a criminal offence may have been committed or the behaviour of the adult may indicate unsuitability to work with children.

If you have concerns about the conduct and behaviour of someone working with children and young people you can contact Central Bedfordshire’s DO as follows:

DO - tel no **0300 30008142** or 0300 300 4833 or 01582 548069.

DO Administrator – tel no 0300 300 4832 or by contacting the

Conference and Review Service on 0300 300 8142

Children’s Specialist Services 0300 3008142

Assessment thresholds and guidance with the relevant numbers can be found at:

<http://www.centralbedfordshire.gov.uk/school/professionals/information-practitioners/threshold-criteria.aspx>

Access and Referral Hub (formerly Intake and Assessment and Early Help Teams) Call **0300 300 8585** during office hours or **0300 300 8123** out of hours

Other numbers can be checked for updates at:

http://bedfordscb.proceduresonline.com/chapters/pr_contacts.html

For the new web-based version of the Bedford Borough, Central Bedfordshire and Luton Safeguarding Children Board Procedures Manual follow

<http://bedfordscb.proceduresonline.com/chapters/contents.html>

Appendix 2

Definition of Private Fostering

A private fostering arrangement is essentially one that is made without the involvement of the Local Authority, for the care of a child under the age of 16 (under 18 if disabled) by someone other than a parent or close relative, for 28 days or more.

Examples of private fostering might include a child or young person living with great grandparents, godparent, great aunt or uncle, a family friend, a step parent where the couple are not legally

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married or a cousin. It will also include a host family who are caring for a child from overseas whilst they are attending education.

Private Fostering would not include a child or young person living with a brother, sister, grandparent, aunt, uncle, and a step parent where the couple are legally married or with a mother or father.

It is a legal duty for parents or the private foster carer to notify Central Bedfordshire's Fostering Service but we also urge anyone who works with children or young people to help identify those potentially vulnerable children.

Help us to keep children safe and support families in your local community by informing us of these arrangements and contacting our Fostering Duty Officer on **0300 300 8181** or by email fostering@centralbedfordshire.gov.uk.

Appendix 3

The Public Interest Disclosure Act 1998 encourages individuals to raise concerns about malpractice in the workplace and this Code makes it clear that employees can raise serious concerns without fear of victimisation, subsequent discrimination or disadvantage and is intended to encourage and enable employees to raise those concerns within the Council, rather than overlooking a problem or “blowing the whistle” outside.

“Whistle-blowing” is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff should acknowledge their individual responsibilities to bring matters or concern to the attention of senior management and/or external agencies. This is particularly important where the welfare of children may be at risk. Staff should follow the school’s whistle-blowing procedures.

As a first step, concerns should normally be raised with your immediate manager or their superior. This depends however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach the safeguarding Governor (Mrs Birtles) or the Chief Executive, Director of Corporate Resources, the Council’s Monitoring Officer, or Head of Audit, Risk and Health and Safety.

Full details of this Procedure can be found within the Central Bedfordshire Council Ethical Handbook, available online at

<https://centralbeds.moderngov.co.uk/documents/s12486/item%20%20planning%20code%20of%20conduct%20italised%20version.pdf>

If a staff member is unhappy with a decision to put a child in for example a Child in Need rather than Child protection Plan, then they should follow the escalation policy from the LSCB.

If a member of staff feels unable to raise concerns regarding internal child protection failures, they can call the NSPCC helpline 8am -8pm 08000280285 or e-mail help@nspcc.org.uk

Appendix 4

DOMESTIC VIOLENCE

Please visit the [Bedfordshire Domestic Violence and Sexual Abuse Partnership](#) for information on partnership working in Bedfordshire.

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The Bedfordshire Domestic and Sexual Abuse Partnership brings together the main statutory and voluntary agencies who are working together to provide and improve services in relation to domestic abuse & sexual abuse across Bedfordshire. The Partnership is actively implementing Strategies and Action Plans which are available on request. The partnership also offers a two tier [training programme](#).

WHAT IS A DOMESTIC ABUSE MARAC?

MARAC stands for Multi-Agency Risk Assessment Conference. It is a meeting where agencies talk about the risk of serious harm to people experiencing domestic abuse in their area, and make safety plans to support those at most risk. The aim is to increase the safety and well-being of the adults and children involved, and reduce the risk of them becoming repeat victims.

WHEN AND HOW DO I REFER TO A MARAC?

If domestic abuse is disclosed to you, the [Risk Indicator checklist](#) (part of the referral forms) should be completed with the client. If this meets with the referral criteria it should be referred to the MARAC. There may be cases where the threshold for referral are not met. Professional judgement should be exercised at all times and in cases where there is an absence of full information or based on your experience you believe it should be referred anyway, please contact the MARAC co-ordinator to discuss this. <https://centralbedfordshirelscb.org.uk/lscb-website/professionals/domestic-violence>

Appendix 5

TYPES OF ABUSE AND NEGLECT (TAKEN FROM KEEPING CHILDREN SAFE IN EDUCATION)

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.

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

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

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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.

Peer on peer abuse: Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. Sexual violence and sexual harassment between children in schools and colleges Context Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of: • making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; • not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and • challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. The initial response to a report from a child is important. It is essential that all victims 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 neither should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 22 in Part 1 of KCSIE. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

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.

SPECIFIC SAFEGUARDING ISSUES

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Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website <http://www.tes.co.uk/> and also on its own website www.nspcc.org.uk Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website: child sexual exploitation (CSE) – see also below; bullying including cyber bullying; domestic violence; drugs ;fabricated or induced illness; faith abuse; relationship abuse; female genital mutilation (FGM) – see also below ;forced marriage; HBA;gangs and youth violence ; gender-based violence/violence against women and girls (VAWG);mental health ;hate; private fostering; radicalisation; sexting ;teenage relationship abuse; trafficking and help for those at risk of trafficking as outlined in the Modern Slavery Act 2015.

Staff should be aware safeguarding issues may manifest themselves via peer on peer abuse.

The school is aware of its duties under the Serious Crime Act 2015:

Section 66-76 offences involving children; section 66 – child cruelty; section 67 – sexual communication; section 68 – sexual exploitation; section 69 – possession of a paedophile manual. The LSCB has a robust strategy set out at: <https://centralbedfordshirelscb.org.uk/lscb-website/home-page>

to address this issue which is informed by the See Me, Hear Me Framework (www.childrenscommissioner.gov.uk). Further information is to be found at <http://www.bedfordshireagainstcse.org/>

The school is aware of its duties under the Serious Crime Act 2015: section 70 FGM; section 71 – provides anonymity for victims; section 72 offence of failing to protect a girl at risk of FGM; section 73 FGM court orders; section 74 duty to notify police; section 75 Guidance from the secretary of state; section 76 controlling or coercive behaviour in intimate or family relationships. The school is aware that FM is a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014. The school recognises that FGM, FM & HBA cannot be considered in isolation to other forms of abuse or exploitation and that there can be an overlap with other areas of need. The LSCB strategy makes it clear that incidents are considered and implemented alongside other strategies and procedures.

Serious violence. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines.

The Modern Slavery Act 2015 – creates two new civil orders to prevent modern slavery; establishes an Anti-Slavery Commissioner; makes provision for the protection of modern slavery victims; aims to help children/young people at risk of trafficking. Guidance on the duty to notify and the MS1 form can be found here <https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery>

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FURTHER INFORMATION ON CHILD SEXUAL EXPLOITATION AND FEMALE GENITAL MUTILATION

Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children’s Social Care.

This document is available to download at: www.gov.uk/government/publications

Forced marriage and FGM can occur in Lower school aged children (or before). Urgent referrals under section 47 should be made to the Police, Child Abuse Investigation Unit (CAIU)/Social Care. The 2003 Act regards FGM as mutilation with a max penalty of 14 years imprisonment. New legislation means that parents can be prosecuted in connection with FGM. There are FGM court orders to prevent occurrence in the same way as there are for forced marriage

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573786/FGMPO - Fact Sheet - 1-12-2016 FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573786/FGMPO_-_Fact_Sheet_-_1-12-2016_FINAL.pdf)

Contact Bedfordshire police if required on 01582-394355/07507648060 and ask for Esther Morris or Josie Haines. Forced Marriage Civil Protection order: www.hm-courts-service.gov.uk/14490.htm.

Forced Marriage Unit <http://www.fco.gov.uk/forcedmarriage>.

Appendix 6

Indicators of Abuse

NB. This guidance is provided as a useful reminder of the indicators of abuse but should be always be considered within the context of a comprehensive training programme and not as a substitute for more in depth consideration

There are four categories of abuse, which may result in a child becoming subject of a Child Protection Plan. They are:



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- Physical Abuse
- Emotional Abuse
- Sexual Abuse including Child Sexual Exploitation
- Neglect

Possible indicators of Physical Abuse

- Unexplained injuries including burns, particularly if they are recurrent
- Improbably excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

Possible indicators of Emotional Abuse

- Physical and/or mental and/or emotional development lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging.

Possible indicators of Sexual Abuse

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money

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- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD
- Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

Possible indicators of Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging.

Appendix: 6 Acceptable use of Mobile telephones for display:

We recognise that the vast majority of adults and an increasing number of children use mobile phones regularly as a primary communication tool and do so in a responsible manner. This part of the policy is to safeguard staff and the whole Pulford community and promote a professional teaching and learning environment.

Mobile technology can contribute positively to support the creation of a safe and secure environment as well as having the potential for misuse that can detract from a safe environment. Some examples that would be relevant would be-

Staff using mobile phones to communicate during a lockdown

To support medical emergencies

To allow communication from other schools in the event of an emergency closure.

Additionally in a drive to improve internet security a code delivered to a mobile device is increasingly being utilised in order to verify credentials.

Pulford School has therefore developed the following Code of Conduct to inform staff and visitors of acceptable procedure.

- a) As a general rule staff and visitors are not permitted to use mobile phones for personal use when children are present other than for Lockdown or a medical emergency.
- b) Staff and visitors are not permitted to take photographs of children on their personal phones (see d. below). The school has a range of devices available for this purpose. Any photos which are taken for medical reasons must be transferred in a timely fashion and deleted as soon as is practical.

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To ensure transparency **all staff are instructed to challenge the use of phones when children are present** and report any concerns to the safeguarding leads.

c) Staff must take additional care when accompanying children swimming, undertaking intimate care and on residential trips. Any equipment capable of video or photography must not under any circumstances be used during swimming, intimate care duties, in children`s bedrooms, showers or toilets unless it is necessary to contact the emergency services.

d) Parents should not use mobile phones or similar devices to photograph/video during the church services out of respect, as we are all taking part in an act of worship. However parents are permitted to use mobile phones and similar devices to photograph/ video school events such as shows and sports day. In any instance, they should not post any images in the public domain without the express permission of those people recognisable in the view finder. Parents should take care not to add identifiable data to images.

Thank you for taking the time to read and adhere to this notice.