



## Pulford V.A. Lower School

Reviewed October 2023

### 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.

Safeguarding is defined as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Child Protection is defined as:

- the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm (Working Together, DfE 2018).

This includes, but is not limited to safeguarding children in specific circumstances:

Neglect	Physical abuse
Emotional abuse	Sexual abuse
Bullying, including online and prejudice-based bullying	Racist, disability and homophobic or transphobic abuse
Gender based violence/violence against women and girls	Radicalisation and/or extremist behaviour
Child Sexual Exploitation and trafficking	The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual Imagery
Teenage relationship abuse	Substance abuse
Gang/youth violence including initiation/hazing	Domestic abuse/violence
Female Genital Mutilation	Forced marriage
Fabricated/induced illness	Poor parenting
Online including grooming via social networking, online gaming, video messaging	Child on child abuse
Self-harm behaviours	Children with mental health difficulties or illness
Upskirting	Contextual/Extra familiar risks

- At Pulford School, we are committed to safeguarding and child protection in line with the statutory guidance (including online safety, filtering and monitoring).
- As required, all staff have read and understood part one of Keeping Children Safe in Education (2023).
- The DSL is: Mr Heather
- The Deputy DSL is: Mrs Rees, Mr Webb and Mrs Major (in pre-school)
- The Safeguarding Officers are: Mrs A. Quick
- The Safeguarding Governor is: Mrs Hinds/Ms Parrish
- The Prevent SPOC (single point of contact) is: Mr Heather and in his absence Mrs Rees
- The Operation encompass SPOC is: Mr Heather and in his absence Mrs Rees
- Local Multi Agency Safeguarding Arrangement

Note:

- The Children and Social Work Act 2017 (the Act) replaces Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and relevant agencies they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children in their area. Education is one of the relevant agencies. In Central Bedfordshire, the arrangements continue to be referred to as the Central Bedfordshire Safeguarding Children's Partnership.

We believe that:

- all children/young people have an equal right to be protected from harm
- children/young people need support which matches their individual needs, including those who may have experienced abuse
- all children/young people have the right to speak freely and voice their values and beliefs
- all children/young people must be encouraged to respect each other's values and support each other
- all children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs
- schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours (behaviours which may be perceived to be 'risky')
- all staff, volunteers and visitors have an important role to play in safeguarding children and protecting them from abuse.

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](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 September 23 updates- Annex F: Table of substantive changes from September 2021*  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2023\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2023_revised.pdf)
- *Working Together to Safeguard Children (DfE, 2018)*  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.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](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>
- Serious crime act 2015: <https://www.legislation.gov.uk/ukpga/2015/9/contents>
- 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](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>
- Use of reasonable force: <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>
- Mental health and behaviour: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- Preventing and tackling bullying: <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- Sexual violence: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- Sexting in schools: <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>
- County lines: <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- Child sexual exploitation: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>
- Domestic violence – Home office Advice: <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>
- <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](https://www.churchofengland.org/sites/default/files/2017-11/Valuing%20All%20God%27s%20Children%27s%20Report_0.pdf)
  
- <https://www.operationencompass.org/school-participation>
  
- This updated version of the policy reflects the fact that there is a no national lockdown due to COVID-19. The school is open to all children. Should a national pandemic arise the school has policies and procedures in place to follow.

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:

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. Clarifying standards of behaviour for staff and children
10. contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values
11. creating an organisational culture that is safe for children
12. introducing appropriate work within the curriculum
13. encouraging children and parents to participate
14. developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns
15. addressing concerns at the earliest possible stage in the least intrusive way

### **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 CBSCP 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.

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 and regular visitors will be aware of this policy and role of designated officers. All staff are 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 through regular training. 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 (2023)*, 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’ 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 Hinds/Ms Parrish 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 Pre-school and is a designated person for the whole school.

### The Role of DSL and DDSL

Our Designated Safeguarding Lead is the headmaster Mr Heather who 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 holds the management oversight for safeguarding and child protection

The Designated Safeguarding Lead is supported by the following Deputy Designated Safeguarding Lead/s: Mrs Rees; Mr Webb; Mrs Major

The Deputy Designated Safeguarding Lead/s 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 (including online safety, filtering and monitoring).

When the school has concerns about a child, the Designated Safeguarding Lead or Deputy will decide, what steps should be taken in accordance with the CBSCP Thresholds Framework and initiate a response accordingly. This may include providing a singly agency early help response, undertaking an early help assessment or a referral to Children's Social Care for a statutory social work assessment. The Head Teacher/Principal will be kept apprised of cases as appropriate.

- the DSL/School/Service will refer to the Model Setting Concern Process if a concern becomes apparent regarding a child. For further information, please see appendix 10
- the Designated Safeguarding Lead will support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff
- the DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with Working Together to Safeguard Children (2018), [the NPCC – when to call police](#) should help the DSL understand when they should consider calling the police and what to expect if they do so.
- the Designated Safeguarding Lead will refer cases to the Police where a crime may have been committed
- seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required
- liaise with the Designated Senior Manager for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child
- the Designated Safeguarding Lead will lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files
- the Designated Safeguarding Lead will ensure safeguarding and child protection information will be dealt with in a confidential manner and in accordance with the LSCB's information sharing guidance.
- staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and / or family.
- a written record will be made of what information has been shared with whom, and when
- the Designated Safeguarding Lead will ensure safeguarding and child protection records will be stored securely in a central place separate from academic records
- individual files will be kept for each child: the school will not keep family files
- the Designated Safeguarding Lead will ensure access to safeguarding and child protection records by staff other than by the Designated Safeguarding Lead will be restricted, and a written record will be kept of who has had access to them and when
- the Designated Safeguarding Lead will ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff
- general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility

The Designated Safeguarding Lead will not disclose to a parent any information held on a child if this would put the child at risk of significant harm. In such circumstances, advice will be sought from Children's Social Care.

If a child moves from our school, the Designated Safeguarding Lead will ensure child protection records are forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary. We will record where and to whom the records have been passed and the date.

If sending by post, children's records will be sent by "Special/Recorded Delivery". For audit purposes, a note of all children's records transferred or received should be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

- if a child is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation



- if a child is being removed from school roll in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team
- where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support
- when a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder - this exchange should be recorded as part of the incoming role holder's induction/performance management.
- in exceptional circumstances when a face-to-face handover is not feasible, the Head Teacher / Principal will ensure that the new post holder is fully conversant with all procedures and case files

### Recording systems and Procedures

Mrs Alison Quick maintains the single central record.

All children protection records are kept in a fireproof cabinet in Mrs Quick's office. In this cabinet is also an overview, which provides an 'at a glance' list of children and adults for whom safeguarding records/concerns exist.

### Inspection

- From September 2019, Ofsted's inspections of early years, schools and post – 16 provision will be carried out under: Ofsted's Education Framework.
- School/service will be aware of the new inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

### We will:

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

1. Ensuring the culture at School is one that is safe for children and unsafe for adults that may pose a risk to children. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Designated Safeguarding Lead or Head Teacher when concerns relate to an adult.

The school has a culture of listening to and hearing the voice of the child.

- 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.
- 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 2023)* 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 CBSCP 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.centralbedfordshirescb.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](mailto: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. Pulford acknowledge that S128 checks should be completed on those members of staff and Governors taking part in management. A section 128 would prohibit someone from:**

- serving as a governor of a maintained school
- holding a management position in an independent school, academy or free school as an employee
- becoming a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school
- becoming a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
- all recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children

**From the 1st January 2021; the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. (Please see paragraph 172 KCSIE for further guidance)**

**We will do this by:**

- 2.1 Following the guidance set out in part 3 of Keeping children safe in education publication (September 2023). References, qualifications and identity will be verified and all documentation kept in a single central record. Schools and colleges should "inform shortlisted candidates" that online searches may be carried out in the recruitment process.
- 2.2 All staff and regular volunteers 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.
- 2.3 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, Mrs Quick, Mr Webb, Mrs Major, Mrs Birtles, Mrs Haines 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 2023). 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/Ms Parrish undertakes periodic checking of the Single Central Record along with staff. 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.

- 2.4 Ensuring that all staff interviews have at least one person on the panel that has completed safer recruitment training.
- 2.5 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.
- 2.6 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.
- 2.7 Ensuring that CBSCP procedures are followed including those for managing allegations and concerns regarding staff and volunteers working with young people.
- 2.8 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.
- 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*; *CBSCP 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 CBSCP 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.

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, Child Criminal
- Neglect

These categories are described in more detail in the appendices including specific safeguarding issues such as child sexual exploitation, CCE, child on child abuse and Female Genital mutilation (FGM), forced marriage (FM), honour based abuse (HBA), preventing radicalisation. The CBSCP 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](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 child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting, upskirting.

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.

**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.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is 7 Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children 9 also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 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 Hinds/Ms Parrish. 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 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 2016,17,18,19,20 and new refresher course booked for January 2023).
- 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](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 *CBSCP 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. 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](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](http://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 in 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.ofm>

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://centralbedfordshirelscb.org.uk/lscb-website/professionals/missing-and-absent> in the case of children who run away or go missing.
- 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](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
- 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, Mr Heather and in his absence 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, 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: Child on child 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 child on child 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

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 CBSCP 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. ‘Report Abuse in Education’ (NSPCC helpline) available from the 1st April 2021 was originally funded until October 2021 but is still available. Young people and adults can contact the NSPCC helpline, Report Abuse in Education on [0800 136 663](tel:0800136663) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- We carry out an annual review of our approach to online safety, filtering and monitoring supported by an annual risk assessment that considers the risks to children.

See child on child abuse policy.

#### **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 child on child 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 CBSCP 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.
- 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
- 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 (CSE) and Child criminal exploitation (CCE)**

- Both Child sexual exploitation and Child criminal exploitation is a form of child sexual abuse. Whilst age may be most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. This abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement based methods of compliance and maybe accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. It can occur 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 CBSCP 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
- 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. If information suggests a child may be at risk of significant harm due to gang related activity, a referral will also be made to the Multi Agency Safeguarding Hub within Children's Social Care.
- All staff will be aware that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. The school have procedures in place in managing poor school attendance and this is regularly reviewed.
- 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 Multi-agency Gang panel (MAGPan) in accordance with local procedures as part of the safeguarding response.
- 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 vulnerable to extremism**

- Pulford School 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. School/service is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- Initial advice may be sought from Prevent Police by email to Prevent@beds.police.uk
- School/service 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 are the 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.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Four. A Prevent risk assessment can be completed in Appendix 11

#### **4.29 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
- Child on child abuse (see separate policy)
- Mental health issues which become a safeguarding concern
- 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
- Safeguarding children on the Autism Spectrum

Further details are available in KCSIE 2023 or the appendix of this document.

## **Domestic Abuse**

Operation Encompass: we are working in partnership with Central Bedfordshire Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass and locally as Operation encompass. In order to achieve this, Central Bedfordshire Council will share police information with the Nominated Operation encompass SPOC of all domestic incidents where one of our pupils has been affected. On receipt of any information, the Nominated Operation encompass SPOC will decide on the appropriate support the child requires, this could be silent or overt.

All information sharing and resulting actions will be undertaken in accordance with the 'CBC Protocol for Domestic Abuse – Notifications to Schools'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

- All staff are aware of The Domestic Abuse Act 2021 which introduced the first statutory definition of domestic abuse. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship



abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

- Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.
- Types of domestic abuse include intimate partner violence, abuse by ex-partners, family members, teenage relationship abuse and adolescent to parent violence.
- Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law
- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

## **Mental Health**

- All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make diagnosis of a mental health problem. However, staff will observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences, can impact on children's mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken following the child protection policy including discussion with the Designated Safeguarding Lead or deputy.

The school will access a range of advice to help them identify children in need of extra mental health support. This includes working with external agencies as described in [Preventing and Tackling Bullying](#)

## **Homelessness**

- Pulford School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- The designated safeguarding lead (and any deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- School/service recognises that whilst in most cases school and college staff will be considering homelessness in the context of children who live with their families, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.
- Staff are aware of the indicators that a family may be at risk of homelessness, to include: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

- Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, but will not replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Local Authority has a legal duty to address concerns under the Homelessness Reduction Act 2017. The focus is early intervention and to encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;

unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded; Denial of Service (Dos or DDoS) attacks or 'booting' - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; making, supplying or obtaining malware such as viruses, with the intent to commit further offences.

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the Designated Safeguarding Lead (or Deputy), should consider referring into the Cyber Choices programme.

Cyber Choices is a nationwide police programme supported by the Home Office and led by the National Crime Agency which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences.

Additional advice can be found at: [Cyber Choices](#)

### 4.30 Children with additional needs

- School/service recognises that while all children have a right to be safe, some children may be more vulnerable to abuse, for example a young carer, a child frequently missing from home/care, children with disabilities or special educational needs, a child living with domestic abuse, parental mental ill health or substance abuse, or a child who has returned home to their family from care.
- 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, the risk assessment *must* be completed prior to convening a meeting of the Governing Board.

### 4.31 In the case of a local tier 4 lockdown being implemented or a nationwide lockdown, procedures defined during full lockdown will once again apply following appropriate risk assessment.

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 and procedures followed if this is not possible. 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 and the Remote Learning Policy. 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 without a responsible adult present
- 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; staff to consider whether the background should be blurred in certain circumstances.
- 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.
- Parents should be cautious about e.g. business calls being picked up on live lessons
- Staff must only use platforms provided by Pulford School to communicate with pupils
- Staff should note time, date and attendance of any sessions held on the class stream.

**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 'Operation encompass' 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 Operation encompass 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.
- 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 CBSCP - Fostering Duty Officer on **0300 300 8181** or by email [fostering@centralbedfordshire.gov.uk](mailto:fostering@centralbedfordshire.gov.uk). (See appendix 12 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. The Curriculum and Teaching safeguarding and measures in place to facilitate and promote the safe use of technology :

### The Curriculum

- 6.1 Pulford School will provide opportunities for children to develop skills, concepts, attitudes and knowledge that promote their safety and well-being together with preparing children for life in modern Britain and embedding Fundamental British Values.
- 6.2 Relevant issues will be addressed through the PSHE curriculum, for example self-esteem, emotional literacy, assertiveness, power, relationship and sex education, online safety and bullying. Delivery of this will be undertaken with reference to guidance around how to promote children's spiritual, moral, social and cultural development. Issues will also be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art etc. Regulations have been put in place whereby the subjects Relationships and Sex Education (for primary pupils) providing a broad and balanced curriculum, which includes covering relevant issues through Relationships Education (for all primary pupils) which was made compulsory in September 2020.
- 6.3 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.
- 6.4 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/>
- 6.5 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 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.
- 6.6 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:

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.

Advice to staff: 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](http://www.saferinternet.org.uk) as well as [www.childnet.com](http://www.childnet.com)

- 6.7 Conducting, through the Governing Board, an annual review of the school's Acceptable Use Policy.
- 6.8 Ensuring that all members of staff with access to ICT systems are responsible for taking the appropriate steps to select and secure their passwords.
- 6.9 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.

- 6.10 Conducting an annual assessment of information risks, which will be reported to the Governing Board.
- 6.11 Making all staff and pupils aware that they have a responsibility to report e-safety or e-security incidents.
- 6.12 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.
- 6.13 Reviewing this log with the Safeguarding Governors at their regular visits and informing them of any actions/ action plans.

## 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 if appropriate.
- 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 CBSCP 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.



- If, in consultation with the CBSCP 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 CBSCP 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 CBSCP 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. Where there is a safeguarding concern, governors and leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The school operates with the best interests of the child at heart.

### **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 CBSCP 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.
- 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 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 CBSCP 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 children

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children.

- We will follow our safeguarding policies and procedure in the event of an allegation regarding an “incident that happened when an individual or an organisation was using their school premises for the purposes of running activities for children.” This includes events such as community groups, sports associations, and more.
- 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 ( LADO) can be referred to on 0300 300 5026**

- The LADO (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 LADO at all stages of the management of the allegation / concern and comply with the Statutory Guidance contained within Keeping Children Safe in Education (2021) 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 LADO 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.
- The school will adhere to the Statutory Guidance contained within Keeping Children Safe in Education (2021) 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](mailto:help@nspcc.org.uk).

**9. We will monitor and evaluate our safeguarding practices and procedures in line with this policy. The Governing Board will ensure that:**

- the school contribute to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children 2018' - this includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans
- the school provides an appropriate safeguarding response in accordance with the Central Bedfordshire Thresholds Framework in order to safeguard children.
- online safety is considered with increasing work online, which poses concerns around potentially harmful and inappropriate online material. Governing bodies will ensure that appropriate filters and monitoring systems are in place.
- the school pays due regard to the need to safeguard children in specific circumstances such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or child on child abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment, upskirting or youth produced sexual imagery.
- the school maintains information about the legal status of all children including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child
- there is a designated teacher with the appropriate training skills and knowledge appointed to promote the academic achievement of looked after children and children previously looked after
- the school's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter- procedures, set up by the Local Multi Agency Safeguarding Board (LSCB). This includes working with Children's Social Care from other areas when children attend school in Central Bedfordshire however live outside of Central Bedfordshire.
- the school shares information with other professionals in the interests of safeguarding children in accordance with the guidance within Working Together to Safeguard Children 2018 and Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, 2015
- the school will follow local procedures for sharing intelligence in relation to Child Sexual Exploitation and Child Criminal Exploitation with Bedfordshire Police, and the Single Point of Contact within Central Bedfordshire Council
- the school initiates appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of their going missing in future
- the Head Teacher/Principal ensures that safeguarding policies and procedures which have been adopted by the Governing Board are consistently implemented
- the school has a staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - staff/child relationships and communications including the use of social media and other online platforms
- the school has procedures for managing allegations and concerns about adults that work or volunteer with children and that these include the procedures for making referrals to the Disclosure and Barring Service and NCTL as the teaching professional body where appropriate
- the school operates, "safer recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education 2021
- the Designated Safeguarding Lead is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated - this is clearly defined within the role holder's job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role as per Appendix B Keeping Children Safe in Education 2021
- the Designated Safeguarding Lead maintains management oversight of any work undertaken by the Deputy Designated Safeguarding Lead
- any Deputy Designated Safeguarding Lead has the appropriate training skills and knowledge to undertake the operational function of the Designated Safeguarding Lead as per appendix B of Keeping Children Safe in Education 2021

- the Designated Safeguarding Lead and any Deputies undertake CBSCP higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role
- in addition, the Designated Safeguarding Lead and any Deputies will update their knowledge by receiving safeguarding updates via the designated safeguarding officer network events, attendance at training and learning events offered by the LSCB, online updates via NSPCC or attendance at professional development events
- the Head Teacher/Principal and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education 2021 and that they receive annual safeguarding updates to ensure their continued professional development
- these updates take account of CBSCP priorities, the local context, the needs of the pupils and other identified training needs
- all training will incorporate safeguarding children in specific circumstances which includes, but is not limited to: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child on child abuse
- the training will ensure that child on child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence - the training recognises how alcohol use, drug use, truanting and youth generated sexualised imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children
- the school has appropriate safeguarding responses for children who go missing from education which should include holding more than one emergency contact number for pupils
- temporary staff and volunteers are made aware of the school's procedures for child protection and their responsibilities
- the school remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the Designated Safeguarding Lead and Deputies in shaping safeguarding arrangements
- there are appropriate online filtering and monitoring systems within the school which safeguards children from accessing inappropriate or harmful online material. Over blocking of material which could impair children's independent research and learning will be avoided
- the curriculum is delivered in such a way to include educating children about how to stay safe which will include Relationship and Sex Education (RSE), online safety and broader safeguarding messages within PSICHE
- ensure that there are processes in place which enables children and young people to express their wishes and feelings and provide feedback
- the governing body reviews the policies/procedures annually
- the nominated governor for child protection at the school is NAME.
- the nominated governor is responsible for liaising with the Head Teacher/Principal and Designated Safeguarding Lead over all matters regarding child protection issues. The role is strategic rather than operational; they will not be involved in concerns about individual children
- ensure a member of the governing body, usually the chair, is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Head Teacher, the principal of a college or proprietor or member of governing body of an independent school

#### **The school:**

- 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; the PSHE and SRE policies; data encompassing policy; the staff, parent and governors codes of conduct; child on child abuse policy; internet safety and AUP.

Policy endorsed by the Governing Board on 18<sup>th</sup> October 2023

Signed: E Price, Chair of the Governing Board

Next Review Date: October 2024

### **Equal Opportunities**

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

## Appendices

### Appendix 1

#### Definitions and indicators of abuse

##### 1. Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school; or
- the child is left at home alone or with inappropriate carer.

##### 2. Physical abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks



- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents being contacted
- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers.

### 3. Sexual abuse

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention seeking behaviour, self-mutilation, substance abuse
- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately
- depression, withdrawal, isolation from peer group
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area.

#### 4. Sexual exploitation

Child sexual exploitation occurs when a child or young person, or another person, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children's social care. The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adult
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the Internet and mobile technology; and
- having unexplained contact with hotels, taxi companies or fast food outlets.

The school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

The intelligence reporting form on the CBSCP website will be used to share information with Bedfordshire Police and Children's Social Care that raises a concern around CSE.

#### 5. Emotional abuse

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

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- the child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- over-reaction to mistakes
- delayed physical, mental or emotional development
- sudden speech or sensory disorders
- inappropriate emotional responses, fantasies
- behaviours such as rocking, banging head, regression, tics and twitches
- self-harming, drug or solvent abuse
- fear of parents being contacted
- running away
- compulsive stealing
- appetite disorders - anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis.

N.B: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

## 6. Responses from parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude towards the child
- unrealistic expectations or constant complaints about the child
- alcohol misuse or other drug/substance misuse
- parents request removal of the child from home; or
- violence between adults in the household.

## 7. Disabled children

When working with children with disabilities, practitioners need to be aware those additional vulnerabilities to abuse and neglect such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

Possible indicators of abuse and/or neglect may also include:

- a bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- not getting enough help with feeding leading to malnourishment
- poor toileting
- lack of stimulation
- unjustified and/or excessive use of restraint
- rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- unwillingness to try to learn a child’s means of communication
- ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting
- misappropriation of a child’s finances; or
- inappropriate invasive procedures.

Mental Health All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only

appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the designated safeguarding lead or a deputy.

## **Appendix 2**

### **Dealing with a disclosure of abuse**

When a child tells me about abuse s/he has suffered, what must I remember?

- stay calm
- do not communicate shock, anger or embarrassment
- reassure the child
- tell her/him you are pleased that s/he is speaking to you
- never enter into a pact of secrecy with the child
- assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this (state who this will be and why)
- tell her/him that you believe them
- children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- tell the child that it is not her/his fault
- encourage the child to talk but do not ask "leading questions" or press for information
- listen and remember
- check that you have understood correctly what the child is trying to tell you
- praise the child for telling you
- communicate that s/he has a right to be safe and protected
- do not tell the child that what s/he experienced is dirty, naughty or bad
- it is inappropriate to make any comments about the alleged offender
- be aware that the child may retract what s/he has told you. It is essential to record all you have heard
- at the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- as soon as you can afterwards, make a detailed record of the conversation using the child's own language – include any questions you may have asked
- Do not add any opinions or interpretations.

NB It is not education staff's role to seek disclosures; their role is to observe that something may be wrong, ask about it, listen, be available and make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or a disclosure of abuse must be reported to Children's Social Care without delay, by the Head Teacher/Principal or the Designated Safeguarding Lead.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead or Head Teacher/Principal.

### **Appendix 3**

#### **Allegations about a member of staff, governor or volunteer**

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**  
For example: the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.
- **Emotional**  
For example: intimidation; belittling; scapegoating; sarcasm;; lack of respect for children's rights; excessive and/or aggressive shouting; and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual**  
For example: sexualised behaviour towards peers; sexual harassment; sexual communication including via social networking, email, text; grooming behavior; and sexual assault and rape.
- **Neglect**  
For example: failing to act to protect a child or children, failing to seek medical attention or failure to meet a child's basic needs.
- **Behaviours which may pose a risk**  
Some behaviours which may take place outside of the workplace could present a transferable risk in an employee's professional role working with or in the vicinity of children. For example, alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in children, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children.

If a child makes an allegation or raises a concern about a member of staff (including supply staff), governor, visitor or volunteer the Head Teacher/Principal should be informed immediately. If the allegation or concern falls within the following criteria, the LADO will be contacted at the earliest possible opportunity and within 1 working day:

- 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 children.

The Head Teacher/Principal will not carry out the investigation him/herself or interview pupils.

If a child makes an allegation of physical abuse against an adult that works with children and there are visible bruises, marks or injuries, or if a child makes an allegation of sexual abuse against an adult that works with children, child protection procedures will be followed and a referral made to the Multi Agency Safeguarding Hub. The LADO will also be informed.

The Head Teacher/Principal must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –

- If the actions of the member of staff are felt likely to fall within the scope of the Interagency Allegation Management Procedures (as stated in point 2), the Head Teacher/Principal will notify the Local Authority Designated Officer (0300 300 5026). The LADO will liaise with the Head Teacher/Principal and advise about actions to be taken which will be in accordance with the Interagency Allegation Management Procedures.
- If the Head Teacher/Principal is uncertain, whether the concern or allegation falls within the scope of the Interagency Allegation Management Procedures, a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.

- Where an allegation has been made against the Head Teacher/Principal, then the Chair of the Governing Body takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the section [on Allegations against Staff and Volunteers](#) in the procedures of the LSCB.

## Appendix 4

### Indicators of vulnerability to radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:  
*‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.’*
3. Extremism is defined by the Crown Prosecution Service as:  
‘The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - seek to provoke others to terrorist acts
  - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - foster hatred which might lead to inter-community violence in the UK.’
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Children may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - identity crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society
  - personal crisis – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
  - personal circumstances – migration; local community tensions; and events affecting the child’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - unmet aspirations – the child may have perceptions of injustice; a feeling of failure; rejection of civic life
  - experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
  - special educational need – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.



However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## **Appendix 5**

### **Female Genital Mutilation**

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse.

It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sexual intercourse, childbirth and mental health.

#### Effects of FGM

There are no health benefits to FGM and it can cause serious harm, including:

- constant pain
- pain and/or difficulty having sex
- repeated infections, which can lead to infertility
- bleeding, cysts and abscesses
- problems passing urine or incontinence
- depression, flashbacks and self-harm
- problems during labour and childbirth, which can be life-threatening for mother and baby.

Some girls die from blood loss or infection as a direct result of the procedure.

#### Why FGM is carried out

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way (for example, as a preparation for marriage or to preserve her virginity).

However, there are no acceptable reasons that justify FGM. It's a harmful practice that isn't required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM.

FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it's carried out.

#### Where FGM is carried out

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays, as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM happening to them.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan
Ethiopia	Somalia	Gambia	Sierra Leone
Guinea	Nigeria	Indonesia	Mali
Ivory Coast	Malaysia	Kenya	Liberia

#### The law and FGM

FGM is illegal in the UK. It is a criminal offence to:

- perform FGM (including taking a child abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM.

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

The 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.

#### Possible signs and indicators of FGM

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Below are some warning signs that MAY indicate a girl is at risk of FGM:

- parents requesting additional periods of leave around school holiday times
- if the girl comes from a country with a high prevalence of FGM
- mother and siblings have undergone FGM
- child may indicate that they are going for a special event (in the UK or abroad).

Further information can be obtained from:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/512906/Multi\\_Agency\\_Statutory\\_Guidance\\_on\\_FGM\\_-\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf)

## **Appendix 6**

### **Safeguarding in specific circumstance: Youth produced sexual imagery**

**Definition: under 18's sending or posting sexually suggestive images, including nude or semi-nude photographs via mobile devices or the internet.**

Incidents covered by this policy:

- person under 18 creates a sexual image of themselves and shares it with another person under 18
- a person under 18 shares an image of another under 18 with another person under 18 or an adult
- a person under 18 is in possession of sexual imagery created by another person under 18

Incidents not covered by this guidance:

- under 18s sharing adult pornography
- under 18s sharing sexual texts without sexual imagery
- adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

The Law

*Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.*

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear.

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the police may need to be involved in cases to ensure thorough investigation including collection of evidence. If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or Children's Social Care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

## Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or Children's Social Care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the young people involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

## Informing parents/carers

Parents/carers should be informed and involved in the process at an early stage unless informing will put the young person at risk of harm. Any decision not to inform the parents/carers would generally be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when the parents/carers should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents/carers themselves.

## Searching devices, viewing and deleting imagery

### Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent/carer in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery then the DSL should:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Head Teacher
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Head Teacher
- ensure viewing takes place with another member of staff present in the room, ideally the Head Teacher/Principal or a member of the senior leadership team (this staff member does not need to view the images)

- wherever possible, ensure viewing takes place on school or college premises, ideally in the Head Teacher/Principal or a member of the senior leadership team's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for the school are followed.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Head Teacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice (note this advice is for schools only).

## *Appendix 7*

### Safeguarding in Specific Circumstances: Gang involvement

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- becoming withdrawn from family
- sudden loss of interest in school - decline in attendance or academic achievement
- starting to use new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- sudden change in appearance - dressing in a particular style or 'uniform'
- dropping out of positive activities
- new nickname
- unexplained physical injuries
- graffiti style tags on possessions, school books, walls
- constantly talking about another young person who seems to have a lot of influence over them
- broken off with old friends and hanging around with a new group
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past

- being scared when entering certain areas
- being concerned by the presence of unknown youths in their neighbourhood

This is not an exhaustive list and should be used as a guide.

## **Appendix 8**

### **Safeguarding in Specific circumstances: Child Sexual Exploitation**

Child sexual exploitation takes different forms - from a seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. There is increasing concern about the role of technology in sexual abuse, including social networking, internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the 'relationship'. The perpetrator always has power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Many children and young people are groomed into sexually exploitative relationships but other forms of entry exist. Some young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

The key indicators of child sexual exploitation include:

#### Health-

- physical symptoms (bruising suggestive of either physical or sexual assault)
- chronic fatigue
- recurring or multiple sexually transmitted infections
- pregnancy and/or seeking an abortion
- evidence of drug, alcohol or other substance misuse
- sexually risky behaviour

#### Education-

- truancy/disengagement with education or considerable change in performance at school.

#### Emotional and Behavioural Issues-

- volatile behaviour exhibiting an extreme array of mood swings or use of abusive language
- involvement in petty crime such as shoplifting, stealing etc.
- secretive behaviour
- entering or leaving vehicles driven by unknown adults
- reports of being seen in places known to be used for sexual exploitation, including public toilets known for 'cottaging' or adult venues (pubs and clubs)

#### Identity-

- low self-image
- low self-esteem
- self-harming behaviour, e.g. cutting, overdosing
- eating disorders
- promiscuity

#### Relationships-



- hostility in relationships with staff, family members as appropriate and significant others
- physical aggression
- placement breakdown
- reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- detachment from age-appropriate activities
- associating with other young people who are known to be sexually exploited
- known to be sexually active
- sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- unexplained relationships with older adults
- possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet
- phone calls, text messages or letters from unknown adults
- adults or older youths loitering outside the home
- persistently missing, staying out overnight or returning late with no plausible explanation
- returning after having been missing, looking well cared for in spite of having no known home base
- missing for long periods, with no known home base
- going missing and being found in areas where they have no known links

Please note: Whilst the focus is often on older men as perpetrators, younger men and women may also be involved and staff should be aware of this possibility.

#### Social Presentation-

- change in appearance
- going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people)

#### Family and Environmental Factors-

- history of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties

#### Housing

- pattern of previous street homelessness;
- having keys to premises other than those known about

#### Income-

- possession of large amounts of money with no plausible explanation
- acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
- accounts of social activities with no plausible explanation of the source of necessary funding

This list is not exhaustive.

## **Appendix 9**

### **Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018**

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

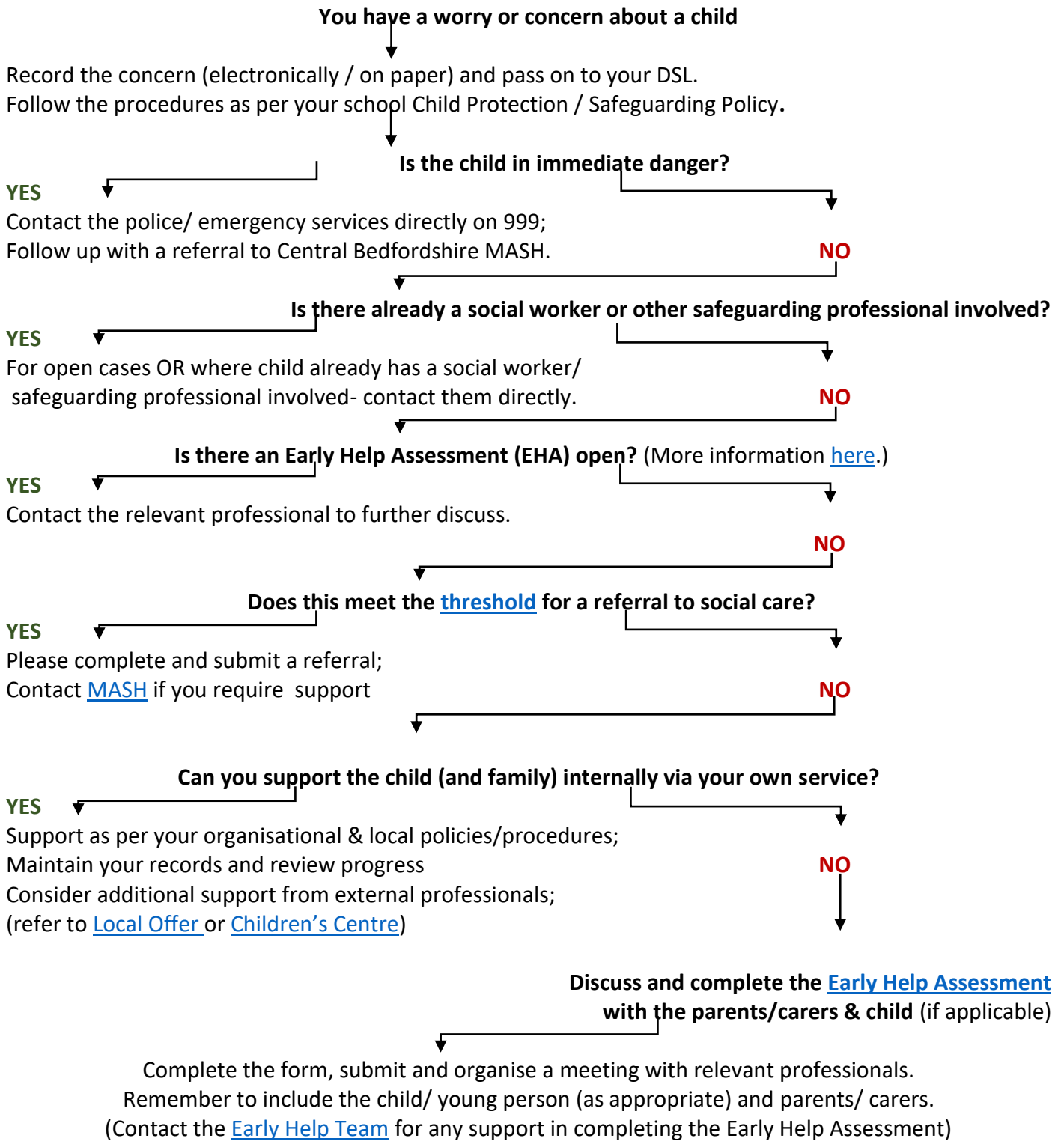
This HM Government advice is non-statutory, and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children and young people and promotes their well-being.

This guidance does not deal with arrangements for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

This guidance has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government *Information sharing guidance for practitioners and managers* published in March 2015.

Concern Process 2023



**If the child concerned is not in immediate danger but you are unsure of what to do, please contact 0300 300 8585 or [cs.accessandreferral@centralbedfordshire.gov.uk](mailto:cs.accessandreferral@centralbedfordshire.gov.uk)**  
(Out of hours: 0300 300 8123)

At all stages, remember to record your concerns and actions in line with your schools’ policies and procedures. Remember safeguarding is everyone’s business. [Working Together to Safeguard Children](#) has details of information sharing to support safeguarding.



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### Operation Encompass

Operation Encompass connects the police with schools to enable that the appropriate support is in place for children who are subject to/witness incidents of domestic abuse. The school environment enabling rapid provision allows for appropriate safeguarding to be put in place against the short, medium and long-term effects of domestic abuse. Following an incident, children may arrive at school distressed, anxious or upset and Operation Encompass ensures that appropriate staff are aware early enough in order to support children in making them feel safe.

Please click [here](#) for more information.

### ADDITIONAL USEFUL NUMBERS

The LADO (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 LADO 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:

LADO - 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



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Other numbers can be checked for updates at: [http://bedfordscb.proceduresonline.com/chapters/pr\\_contacts.html](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 11 - Prevent in Education Risk Assessment and Practice Action Plan

	YES	NO	Existing Controls	Further Action	Staff responsible	Due Date
Does your safeguarding policy make explicit that the school sees protection from radicalisation and extremist narratives as a safeguarding issue?	x		Yearly whole staff training		DSL and DDSL	January 23
Are the lead preventive responsibilities clearly identified in the policy?	X		Governor roles are reviewed as necessary when there is a change of personnel		DSL and clerk	
Prevent Single Point of Contact (SPOC)/ Safeguarding Lead	X					
Governor Safeguarding Lead	x					
Does policy make explicit how PREVENT concerns should be reported within school?	x					
Prevent and Fundamental British Values considered in curriculum planning?	x					
Does the school have clear guidance for visitors including faith related visiting speakers?	X		All are known to the school and/or undergo DBS Lettings to Christian churches are given a copy of the policy. The hall is not			
Checks for speakers/visitors to the school?	X					
Checks for premises use by externals?	X					
<b>Have ALL staff received appropriated training on PREVENT?</b>						



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<p>Does this include support staff?          Are there provisions for new staff induction?          Have governors received a governor PREVENT briefing?</p> <p>Do all staff know what to do if they have a PREVENT concern and to whom to report it?</p>	<p>X X X x</p>		<p>let to political parties.          Staff have safeguarding induction.          Governors are invited to staff training.</p>			
<p><b>Does the online safety policy refer to the requirements of the Prevent guidance?</b></p> <p>Appropriate filtering is in place to ensure that staff and children are unable to access unauthorised or extremist websites online through school systems</p>	<p>x</p>		<p>Updated as per cycle          Provided through E2BN</p>			
<p><b>Protocols in place to manage the layout, access and use of any space provided for the purposes of prayer and faith facilities?</b></p>	<p>x</p>		<p>Christian altar in the hall</p>			
<p><b>Clear guidance on governing the display of materials internally at the school?</b></p>	<p>x</p>		<p>Christian values displayed. RE displays concern topics studied as per the curriculum.          No political material displayed in public areas.</p>			

### Appendix 12

#### Definition of Private Fostering





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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 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](mailto:fostering@centralbedfordshire.gov.uk).

### ***Appendix 13***

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 Hinds/Ms Parrish) or the Chief Executive, Director of Corporate Resources, the Council’s Monitoring Officer, or Head of Audit, Risk and Health and Safety.



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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%208%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](mailto:help@nspcc.org.uk) ( although the number is still available it is no longer funded).

### **Appendix 14**

#### **DOMESTIC VIOLENCE**

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

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>



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### **Appendix 15**

#### **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 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.. The school also 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.  
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, after Christmas productions and sports day. In any instance, they should not post any images in the public domain without the express permission of those people



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recognisable in the view finder. There are vulnerable children in the school to whom this could pose a danger. Parents should take care not to add identifiable data to images.

### **Appendix 16**

#### **Roles and responsibilities of the Governing Board**

##### **The governing body/equivalent will ensure that:**

- the school contribute to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children 2018' - this includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans
- the school provides an appropriate safeguarding response in accordance with the Central Bedfordshire Council Threshold framework in order to safeguard children.
- online safety is a running and interrelated theme whilst devising and implementing the whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety, filtering and monitoring whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
- the school pays due regard to the need to safeguard children in specific circumstances such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or child on child abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment, upskirting or youth produced sexual imagery.
- the child protection policy reflects and addresses additional challenges exist for those children with special educational needs and disabilities and physical and mental health needs, and the school should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- the school maintains information about the legal status of all children including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child



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- there is a designated teacher with the appropriate training skills and knowledge appointed to work with the virtual school head to promote the academic achievement of looked after children and children previously looked after
- the school's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter- procedures, set up by the Local Multi Agency Safeguarding Board. This includes working with Children's Social Care from other areas when children attend school in Central Bedfordshire however live outside of Central Bedfordshire.
- the school shares information with other professionals in the interests of safeguarding children in accordance with the guidance within Working Together to Safeguard Children 2018 and Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, 2015
- they recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that clearly set out the processes and principles for sharing information within the school and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.
- that School staff be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.
- they are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- relevant staff have due regard to the relevant data protection principles
- the school will follow local procedures for sharing intelligence in relation to Child Sexual Exploitation and Child Criminal Exploitation with Bedfordshire Police.
- the school initiates appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of their going missing in future
- the Head Teacher/Principal ensures that safeguarding policies and procedures which have been adopted by the Governing Body are consistently implemented
- the school has a staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - staff/child relationships and communications including the use of social media and other online platforms



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- the school has procedures for managing **any** allegations and concerns about adults that work or volunteer with children, that **may** or **may not** meet the harm threshold and that these include the procedures for making referrals to the Disclosure and Barring Service and TRA where appropriate.
- the school operates, “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education 2023.
- the Designated Safeguarding Lead is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated - this is clearly defined within the role holder’s job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role as per Appendix C Keeping Children Safe in Education 2023
- the Designated Safeguarding Lead maintains management oversight of any work undertaken by the Deputy Designated Safeguarding Lead
- any Deputy Designated Safeguarding Lead has the appropriate training skills and knowledge to undertake the operational function of the Designated Safeguarding Lead as outlined in Keeping Children Safe in Education 2023
- the Designated Safeguarding Lead and any Deputies undertake CBSCP higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role
- in addition, the Designated Safeguarding Lead and any Deputies will update their knowledge by receiving safeguarding updates via the designated safeguarding lead forums, attendance at training and learning events offered by the CBSCP, online updates via NSPCC or attendance at professional development events
- the Head Teacher/Principal and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education 2023 and that they receive annual safeguarding updates to ensure their continued professional development
- all Governors and Trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- training updates take account of CBSCP priorities, the local context, the needs of the pupils and other identified training needs
- all training will incorporate safeguarding children in specific circumstances which includes, but is not limited to: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child on child abuse
- the training will ensure that child on child abuse is never seen as ‘banter’ or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence - the training recognises how alcohol use, drug use, truanting and youth generated sexualised imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children
- the school has appropriate safeguarding responses for children who go missing from education which should include holding more than one emergency contact number for pupils
- the school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation



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- temporary staff and volunteers are made aware of the school's procedures for child protection and their responsibilities
- the school remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the Designated Safeguarding Lead and Deputies in shaping safeguarding arrangements
- the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.
  
- the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Governing bodies should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks. Over blocking of material which could restrict children's online learning will be avoided.
- the curriculum is delivered in such a way to include educating children about how to stay safe which will include Relationship and Sex Education (RSE), online safety and broader safeguarding messages within PSHE
- children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- the governing board reviews the policies/procedures annually
- a member of the governing body, usually the chair, is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Head Teacher, the principal of a college or proprietor or member of governing body of an independent school

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