

## Safeguarding Policy

The first responsibility of all staff and volunteers at Heritage School is to prevent, as far as it is within our power to do so, 'significant harm' (in the form of neglect or physical, emotional, or sexual abuse) occurring to children in our care and to support vulnerable children in our care. It is important to recognise that pupils with Special Educational Needs or Disability (SEND pupils) are often particularly vulnerable and that additional barriers (e.g. communication barriers) may exist when seeking to determine whether there has been abuse and neglect.

All school staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer significant harm. All staff have a responsibility to take appropriate action, working with other services as needed.' ('Keeping Children Safe in Education', September 2020). Every other good we aspire to achieve for children will be undermined if we fail to meet our responsibilities in this area.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; and a lack of challenge to those who appear not to be taking action.

This policy covers all pupils in the school, including those in EYFS. The policy is available to parents, both on the website and on the portal. Parents who wish to view the Staff Code of Conduct may access this document by visiting the school office.

This policy explains:

1. prevention strategies,
2. procedures for dealing with child protection issues,
3. guidance on recognising abuse (Appendix 1).

It draws upon the Department for Education guidance Keeping Children Safe in Education (September 2020). Other key documents are:

- Working Together to Safeguard Children (September 2018)
- What to do if you're worried a child is being abused (March 2015)
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (July 2018)
- Prevent Duty Guidance for England and Wales (March 2015)
- When to Call the Police, Guidance for Schools and Colleges from the National Police Chief's Council

Other relevant school policies that should be referred to in association with this policy are: Preventing Extremism Policy, Disclosure and Barring Service Clearance Policy, and Safer Recruitment Policy.

The legislation that governs our practices with respect to child protection is:

- 1989 Children's Act (sections 47 and 17 define the duties of the local authority for all children in its area) which establishes the concept of 'significant harm', or the likelihood thereof, as the basis for intervention,
- 2002 Education Act (section 157 states the responsibility of an independent school to meet standards with respect to the welfare, health and safety of pupils),

- 2004 Children's Act (section 58 removes the defense of 'reasonable chastisement' and therefore exposes parents or those acting in loco parentis to a charge of Actual Bodily Harm if there is bruising, etc. as a result of discipline).

The Cambridgeshire and Peterborough Safeguarding Children Partnership Board (CPSCP) is responsible for establishing local procedures and ensuring that agencies work together to safeguard children. The following Safeguarding Partners have agreed these procedures, in accordance with the Children and Social Care Act 2017: Cambridgeshire County Council, Peterborough City Council, Cambridgeshire Constabulary and the Cambridgeshire and Peterborough Clinical Commissioning Group.

Heritage School accesses training on a regular basis for its DSL and Deputy DSLs through the Education Child Protection Service.

## **1. Prevention**

Heritage staff members seek proactively to prevent significant harm coming to children in our care through an effective induction and training, adherence to our Code of Conduct, effective pastoral care and effective teaching about personal, social, health and emotional issues across the curriculum.

### **1.1 Staff Induction and Training**

Prior to working with or around children new staff will meet with a suitable member of staff (e.g. the DSL or a Deputy) to review this policy. This will cover the following:

- The school's procedures for dealing with and referring concerns, in accordance with locally agreed inter-agency procedures.
- The school's arrangements for dealing with peer-on-peer abuse, including sexting and any other relevant issues, and how victims and perpetrators will be supported.
- The school's arrangements for dealing with allegations of abuse against staff, volunteers or the Headmaster, and how perpetrators will be supported.
- The school's Staff Code of Conduct.
- The school's whistleblowing procedures.
- The school's recruitment procedures in keeping with our Safer Recruitment Policy.
- How safeguarding is managed, including the responsibilities of the DSL and Deputy DSLs.
- Ongoing training of staff and the DSL and Deputy DSLs.
- How the Board of Trustees exercises oversight for Safeguarding at Heritage School.
- How the school fulfills its various safeguarding and welfare responsibilities, including how we approach online safety and arrangements for looked-after children, if relevant.
- Contact details for making a referral.
- The school's Acceptable and Safe Use of Screens Policy, including the use of phones and cameras in EYFS.

Once per year thereafter, every staff member and Trustee is expected to read this policy, as well as KCSIE Part 1 and Annex A, and sign a form declaring they have done so.

Induction training for new staff and trustees will also include the Preventing Extremism Policy, the Code of Conduct, the Acceptable and Safe Use of Screens Policy, and other relevant policies.

Refresher training for all staff will take place regularly, with updates as required and at least annually. This will include prevent awareness and how to identify children and young people at risk, and online safety.

All staff regularly involved with recruitment will be directed to our Safer Recruitment Policy and to undergo relevant training.

## **1.2 Safer Working Practices**

All volunteers and staff agree to adhere to the following guidelines in order to reduce the risk of abuse or a false allegation of abuse. Please also ensure you read the Staff Code of Conduct.

### **1.2.1 Physical contact**

Whilst it would be undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. It should be noted that young children generally initiate contact; staff should generally be reactive to physical contact not proactive. Where incidents occur which might otherwise be misconstrued, this will be appropriately recorded and reported to the Headmaster.

### **1.2.2 Being alone with pupils**

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than formal teaching situations such as musical instrument tuition or invigilation (where visual access is not possible) all other one-to-one work such as coaching, counselling or tutor meetings should take place in an area either where there is visual access and/or an open door. Some of the doors in the Senior School now have glass panels in them, so a room with these in should be chosen if possible for one-to-one meetings. Ordinarily two members of staff ought to remain after school should a parent be delayed collecting a child.

### **1.2.3 Volunteers**

From a child protection point of view, there are two groups of volunteers: (1) those who exercise sole responsibility for children, and (2) those who are always under the direct supervision of DBS (Disclosure and Barring Service) checked staff. Regular volunteers will be required to read this policy at the time of their appointment and once per year thereafter. Both will be required to adhere to this code of conduct. Any volunteer who ever has sole responsibility for children will be DBS checked prior to assuming those responsibilities and those who work with EYFS children (i.e. aged 5 and under) will sign a form to declare that they are not disqualified from working with children. A DBS-checked member of staff will be in the immediate vicinity for scribes.

### **1.2.4 Visiting Speakers**

Photographic identification must be provided by all visiting speakers when they sign in, and they will be supervised by a member of staff throughout their visit to the school.

### **1.2.5 Discipline**

Children will be treated with respect and dignity and no punishment, detention, or sanctions are allowed outside of those detailed in the school's Behaviour Policy.

### **1.2.6 Speech with pupils**

Treating pupils with respect and dignity means that staff should never use sarcastic or belittling comments. Language of this nature can cause significant emotional harm.

### **1.2.7 First Aid**

Except in cases of dire emergency, first aid will only be administered by qualified first aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.

### **1.2.8 Using the toilet**

If a child needs help with toileting or washing after soiling themselves, another adult should be present or within earshot. If a male member of staff is providing any form of intimate care, a female colleague will be present. All first aid treatment and non-routine changing or personal care will be shared with parents/carers at the earliest opportunity.

### **1.2.9 Security**

- No internal doors to classrooms will be locked whilst pupils are present in these areas. visitor
- Entry to school premises will be controlled by doors that are secured physically.

- Authorised visitors to the school will sign in and out at the school office, they will wear visitors lanyards, and will be supervised. Unidentified visitors will be challenged immediately by staff and reported to the Headmaster or school office.
- The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils will be reported to the police.

#### **1.2.10 Home time**

Accurate records of those with parental responsibility and emergency contacts for each child will be regularly updated. Pupils will only be released into the care of those with parental responsibility or someone acting with their prior consent.

#### **1.2.11 Online, or otherwise, relationships with pupils outside of school**

Members of staff should, under no circumstances, meet alone with a pupil outside of school hours or off the school premises. Staff should never enter into an online relationship with pupils (e.g. by becoming a 'friend' on Facebook). Should a teacher ever need to communicate directly with a pupil via email, this should always be done via e.g. the Head of Seniors and parents should be copied into the email.

#### **1.2.12 Photography**

Staff will take photographs of pupils on school trips or undertaking routine school work for the purpose of preparing a display or in support of the marketing activities of the school. Staff may not take photographs of pupils using their own devices. School approved stand-alone cameras must be used for taking photographs. A camera can be acquired from the school office. Staff should delete photos not suitable for marketing or display purposes directly off the camera. Staff in the office will then make the remaining photos available to the Marketing Officer. These procedures, like all others identified in this policy unless explicitly stated to the contrary, should be understood to apply equally to EYFS.

Any photographic images used by the school for advertising purposes are only done with the prior consent of the parents concerned. Staff are expected to be aware of the pupils for whom the school does not have parental consent to use photographs. Regular updates are sent to staff. Staff should ask in the School Office for information if they are uncertain.

Staff should be aware that parents, carers or relatives may occasionally wish to take still or video photographic images of their child at a school event (e.g. a nativity play). Parents are informed that all such photography is for private use only and that images of other children must never be put online (e.g. on Facebook).

Pupils are only allowed to use cameras on educational visits on specific occasions. No smart phones are ever allowed by pupils in school or on school trips. There is, therefore, no risk during school hours of photographs of other pupils being misused. For more information about the use of smartphones and other electronic devices see our Acceptable and Safe Use of Screens Policy.

#### **1.2.13 Whistleblowing**

The safety of children is paramount. Staff members are encouraged to raise any concerns they may have about any practice that is poor or unsafe, or about any actual or potential failures in the implementation of this Safeguarding Policy, or any other relevant policy, such as our Health and Safety Policy. See section 2.6 below for specific information about how to handle allegations against staff, including against the Headmaster or the DSL. If the safety of a child is compromised by the actions of any member of staff, contact the appropriate staff member immediately (a line manager, the DSL, a DP, the Headmaster, etc.). Please note that any member of staff can make a referral to Cambridgeshire Social Care. See section 2.4 below.

#### **1.2.14 Recruitment**

All staff recruited to Heritage will be subject to appropriate character, identity, qualification and health checks. Staff working in EYFS or with childcare outside of normal school hours will also be required to declare that they are not disqualified from working with children. Periods of unemployment will be queried. References will be verified and DBS with barred list checks undertaken. Interviews with

prospective staff will outline our child protection procedures in detail. Please see the school's Disclosure and Barring Service Clearance Policy and its Safer Recruitment Policy.

### **1.3 Pastoral care**

All Heritage staff, and class teachers in particular, have a responsibility for the pastoral needs of the children in their care. This includes:

- provision of opportunities for children to share and discuss their concerns with a trusted adult,
- provision of a classroom environment where every child feels secure, where supportive friendships are encouraged and where children feel safe to express their views and concerns,
- special attention to the needs of vulnerable children, offering support and advice.

### **1.4 PSHE and RE/RSE**

Our Personal, Social and Health Education (PSHE), as well as our Relationships Education (RE) for Infants and Juniors and our Relationships and Sex Education (RSE) for Seniors is designed to give pupils the tools they need to keep safe.

Our PSHE and RE/RSE curriculum, for example, will help pupils:

- to recognise and manage risks in different situations and how to behave safely,
- to recognise and understand the particular dangers associated with online abuse (see Appendix A of this policy and the Appendix to our Acceptable and Safe Use of Screens Policy),
- to judge what kinds of physical contact are acceptable and unacceptable,
- to recognise when pressure from others (including people they know) threatens their personal safety and well being,
- to recognise peer-on-peer abuse, including sexual abuse,
- to know when and to whom to turn to for help, including whom they can talk to at school and outside of school if they should feel concerned about their safety,
- to find acceptable ways to express their feelings,
- to have the self confidence and the vocabulary to resist inappropriate approaches.

For more information see the following policies:

- PSHE and Citizenship Policy
- RE and RSE Policy
- Acceptable and Safe Use of Screens Policy

### **1.5 Mental Health Awareness**

All staff are made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Such experiences can have a severe impact on a child's behaviour and educational attainment.

If staff have a mental health concern about a child that is also a safeguarding concern they should raise their concerns immediately with the Designated Safeguarding Lead or a Deputy.

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.

Further advice can be found here:

- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2020)
- Mental health and behaviour in schools: departmental advice (2018)
- Counselling in schools: a blueprint for the future (2016)
- Promoting children and young people's emotional health and well-being: a whole school and college approach (2015)

We are in the process of developing a more comprehensive Mental Health Policy.

## **2. Procedures**

### **2.1 Who is responsible**

The Designated Safeguarding Lead (DSL) is: J W Fletcher, Headmaster

The Deputies (DPs) are: J Carter, Head of Infants and B Scarlata, Head of PHSE.

The DSL is responsible for:

- managing referrals of cases of suspected abuse to the appropriate agencies,
- acting as a source of advice within the school,
- ensuring that staff are familiar with the policy and procedures,
- passing on child protection files to new schools/colleges as soon as possible after the child has left Heritage,
- organising training on child protection within the school,
- ensuring that our PSHE programme effectively teaches pupils how to keep themselves safe, including with respect to online safety.

Jean Carter (DP) has special responsibility for the operation of this policy with respect to EYFS.

The DSL and DPs will undergo refresher training every two years and will refresh staff understanding at least annually. New staff will be made aware of this policy as part of their contract of employment and undergo online training.

Trustees hold the ultimate responsibility for ensuring that safeguarding concerns are dealt with in accordance with this policy. A particular Trustee (currently D Leckie) holds named responsibility to oversee the content and operation of this policy and will liaise regularly with the DSL and other members of staff as required. Safeguarding is a standing item at meetings of trustees, and trustees conduct a formal review of the content and operation of this policy annually.

### **2.2 What to do if you suspect abuse**

All staff are responsible for the welfare of all children in our care. All staff should be alert to possible abuse and be prepared to 'believe the unbelievable'. We recognise the danger of assuming abuse could never happen in our community. If a member of staff, including voluntary staff, suspects a child is being abused or is at risk of significant harm either in school or out of school, he/she should immediately:

- write down any information before it is forgotten (a formal log of concern can be created from these notes, on a disclosure form);
- refer to Appendix 1 of this policy where there are doubts about whether or not a child is at risk or has been abused;
- speak to the DSL/DPs as soon as possible (whilst the DSL will usually decide whether to make a referral, it is possible for any staff member to refer their concerns to Cambridgeshire Children's Social Care directly);

Then, if the child's situation does not appear to be improving, the staff member with concerns should press for reconsideration by the DSL.

### **2.3 Contacting the DSL and Deputy DSLs**

The DSL and/or a Deputy DSLs is onsite at virtually all times. Whenever the DSL, who works full time, is off site, the school office will know how to make contact with the DSL. Contact details for the DSL and Deputy DSLs (email addresses and mobile phone) can be obtained from the school office during all business hours. The office can also provide contact details for the Chairman of Trustees should there be a concern about the behaviour of the DSL.

### **2.4 Guidance on dealing with a disclosure of abuse**

Staff need to be prepared for a child to disclose information about abuse. Information may be offered in response to an appropriately broad question or it could be entirely unsolicited.

### **2.4.1 Effective listening**

Staff should:

- Listen to the pupil, keeping calm and offering reassurance - e.g. that they are doing the right thing, that you recognise how hard it is for them, that other children have been in similar situations and have come through.
- Let the child lead the conversation. Do not press for details. Ask very open or broad questions.
- Don't lay the blame or criticise either the child or the perpetrator.
- Don't promise confidentiality; explain that you will need to tell others and why.
- Observe bruises, but you should not ask a child to remove or adjust their clothing to observe them.
- Don't promise that you can 'fix things' easily or immediately.
- If peer-on-peer abuse involving sexting or sexual violence is concerned, staff need to ensure they never view or forward images of a child (see below under dealing with Online Abuse).

### **2.4.2 What you are listening for**

The goal is to discover enough information to determine whether a referral to the Social Care Team or police is necessary. If it quickly becomes clear, for example, that there is suspected sexual abuse, there is no need to 'investigate' or press for details because an investigation will be undertaken by the Social Care Team and the police.

### **2.4.3 Immediate recording on a Disclosure Form**

It is essential that staff record the allegations immediately in note form then onto a Disclosure Form (available on the staff room notice board) or directly onto a Disclosure Form. In particular take note of who might have been witnesses. Any original notes should be dated and signed and submitted to the DSL with the Disclosure Form for action and secure filing. On the Disclosure Form you must note:

- the full name of the child
- the date and time of disclosure,
- the place and context of the disclosure or concern,
- the facts you need to report,
- whether or not there are any witnesses, and if so, who they are.

### **2.4.4 Early Help**

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges and can help prevent further problems arising.

Practitioners should, in particular, be alert to and report to the DSL or a Deputy the potential need for early help for a child who:

- is disabled and has specific additional needs,
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan),
- is a young carer,
- is showing signs of being drawn into antisocial or criminal behaviour, including gang, involvement and association with organised crime groups,
- is frequently missing/goes missing from care or from home,
- is at risk of modern slavery, trafficking or exploitation,
- is at risk of being radicalised or exploited,
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse,
- is misusing drugs or alcohol themselves,
- has returned home to their family from care, or
- is a privately fostered child.

Where it is judged by the DSL (and Deputy DSLs) that effective early help requires the involvement of additional agencies outside the school, the DSL will contact Cambridgeshire Children's Social Services (see 2.4.1 below).

#### **2.4.5. Sharing information**

Information sharing is essential for effective safeguarding. Concerns about a possible infringement of the Data Protection Act 2018 should not stand in the way of the need to protect children at risk of abuse or neglect.

However practitioners should ensure that the information they share is necessary for the purpose for which they are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

When deciding when and how to share information, staff should refer to the seven golden rules and the flowchart in Appendix C.

#### **2.5 Involving the local authorities**

Note: The online tool Report Child Abuse to Your Local Council (<https://www.gov.uk/report-child-abuse-to-local-council>) can be used to find the Children's Social Care contact number for any area in the country.

Please see also Appendix B for a flow chart illustrating actions that should be taken when we suspect a child has been abused or is at risk of abuse.

##### **2.5.1 Referral or not?**

Upon receipt or completion of a Disclosure Form, the DSL/DP will consider whether an early help assessment or a referral is needed.

As noted above, whilst the DSL/DP will usually decide whether to make a referral, any staff member can refer their concerns to Children's Social Care Services directly.

##### **2.5.2 Prior discussion with parents/carers?**

Ordinarily the DSL/DPs will contact the parents/carers before a referral to Cambridgeshire Children's Social Care Services (0345 045 5203, Mon-Fri 0800-1800, or 01733 234724 out of hours) is made. However, if the concern involves alleged or suspected sexual abuse or the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing will be said ahead of referral. The situation must be very serious to avoid speaking to the parents/carers as failing to do so is likely to create tension in the relationship with those parents/carers.

##### **2.5.3 Who to call: Social Care Team or Police?**

If, after clarifying the situation directly with the parents/carers a referral is required, the DSL will contact Cambridgeshire Children's Social Care Services (0345 045 5203, Mon-Fri 0800-1800, or 01733 234724 out of hours). If there is an immediate threat of harm to the child, the DSL will contact the Child Abuse Investigation Unit of the Cambridgeshire Constabulary (01480 847743). Ordinarily, it will be sufficient to refer the matter to Cambridgeshire Children's Social Care Services (0345 045 5203, Mon-Fri 0800-1800, or 01733 234724 out of hours), who will, in turn, contact the police if necessary.

##### **2.5.3 What happens after a referral to Cambridgeshire Children's Social Care Services?**

The following steps will take place upon making a referral:

- Social Care, together with the police, will decide what action will be taken, within 24 hours.
- If an assessment is needed then this will be organised by Social Care. An early help assessment may be recommended and/or referral to other specialist or universal services.
- Social Care will decide whether the case should be escalated to Child in Need (Section 17), which entitles the child concerned to the provision of services by the Local Authority in an attempt to reduce risk and promote a reasonable standard of health and development. The

case worker gathers more information from children, parents, family members and other professionals.

- This leads to a Strategy Discussion involving relevant parties and intended to determine whether the case should be escalated further.
- If the Strategy Discussion suggests that a child may be at risk of significant harm then those who work with the child will determine whether there should be a Section 47 Enquiry to assess more fully the child's welfare and safety needs. If so, further enquiry is made and the child becomes subject to a Child Protection Plan, administered by a Child Protection Conference composed of professional and family members. This Conference will determine when it may be appropriate to de-escalate the support arrangements.

## **2.6 Allegations against staff**

### **2.6.1 A culture of openness**

As noted in 1.2.11 above, staff members are encouraged to share any concerns they may have about the behaviour of other staff immediately with the DSL/Headmaster; or the chair of governors, Tom Amies, and local authority if the concern involves the Headmaster. Staff are advised to contact the NSPCC Whistleblowing Advice Line if they would like independent advice or guidance in handling an allegation against a staff member, or if they have concerns about the way a case is being handled by the school. Staff can call 0800 0280285 from 8am to 8pm Monday to Friday or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

All allegations against staff should be dealt with using common sense and good judgement. If the allegation concerns minor physical mishandling or verbal abuse, this will normally be dealt with under the school's Complaints Procedure. It is possible to have an informal discussion with the local authority without naming the staff member concerned if it is unclear whether the reporting criteria are met.

### **2.6.2 Reporting criteria**

Allegations which meet the reporting criteria are those which allege significant harm to a child, or a criminal offence, or where there is a serious risk of either. See KCSIE 2020, part 4, for further information.

### **2.6.3 Referral procedures**

An allegation which meets the reporting criteria must be reported to the local authority within one day of the allegations coming to light. It is imperative that all unnecessary delays are eradicated.

The Headmaster (DSL) will make immediate contact with the local authority designated officer (01223 727967) Monday-Friday, or the Emergency duty team out of hours on 01733 234724, or with the police in the most serious cases. Staff should not undertake their own investigations without prior contact with the local authority or the police so as not to jeopardise any statutory investigations.

Discussions with the local authority will consider the nature, content and context of the allegation and agree a course of action, including any involvement by the police. Discussions with the local authority should be recorded in writing by the local authority and careful notes should also be made by the person making the referral to the local authority (the DSL, another staff member, or chair of governors).

The DSL (or another staff member, or the chair of governors) will consider with the local authority whether the circumstances of the case warrant suspension - which should be seen as a last resort - or whether it would be possible to put new arrangements in place to mitigate risk while further investigation is undertaken. While protecting children is paramount, the duty of care toward the member of staff must also be discharged by ensuring that his/her reputation is not unjustly maligned and the he/she has effective support.

### **2.6.4 Investigation timescales**

Where the allegation is serious, and does not appear malicious, every effort will be made to conduct the investigation in a timely manner. KCSIE 2020, part 4, paragraph 245 says that 80% of cases

should be resolved within one month, 90% within three months, and all but the most exceptional within 12 months.

#### ***2.6.5 Response to malicious allegations***

Where an accusation is found to be malicious, the Headmaster will consider, with Trustees as necessary, whether disciplinary action is appropriate against the person who made the allegation.

#### ***2.6.6 Allegations against the Headmaster***

If you suspect the Headmaster has harmed or poses a risk of causing harm to children, you should immediately contact the local authority designated officer (01223 727967 of Cambridgeshire County Council for advice and inform the Chair of Trustees (contact details can be acquired from the school office) who will then consult with the local authority. The Headmaster should not be informed of the allegation prior to contacting the local authority.

#### ***2.6.7 Confidentiality***

Staff who become aware of the allegation must make every effort to maintain confidentiality and guard against untimely publicity. Identification of a member of staff who is subject to an allegation, prior to that person being charged with an offence, violates the statutory reporting restrictions (see the Education Act 2002; see also KCSIE 2020, paragraph 233).

#### ***2.6.7 Reporting abuse by staff to the DBS and the TRA***

The school will report to the Disclosure and Barring Service (DBS) any person working at the school who has caused significant harm to a child; such a person can expect their work at Heritage School to be terminated. The school will also make a referral to the Teaching Regulation Authority (TRA), which will investigate whether a prohibition order against a former member of staff, contractors or volunteers may be appropriate.

#### ***2.6.8 Record keeping***

Any records pertaining to an allegation against staff will be preserved for the duration of any inquiries and until the accused has reached normal pension age or 10 years from the date of the allegation.

#### ***2.6.9 Further Information***

The DSL or other persons managing an allegation against a member of staff will benefit from consulting KCSIE 2020, Part 4 for further information.

### **2.7 Working with parents**

#### ***2.7.1 Parental Responsibility***

Where important decisions respecting the welfare of a child are at stake, it is essential to know who has Parental Responsibility. Parental Responsibility is defined by the Children's Act (1989), Section 3(1) as "all the rights, duties, powers, responsibilities and authority which by law a parent of a child has in relation to the child and his property." Who has Parental Responsibility?

- all birth mothers,
- most birth fathers if they are married to the child's mother or listed on the birth certificate (after a certain date, depending on which part of the UK the child was born)

How can Parental Responsibility be acquired:

- if the father marries the mother,
- if the father is granted a Parental Responsibility Order by a court,
- if the father enters into a "Parental Responsibility Agreement",
- if the father is granted a Residence Order by a court,
- if a step-parent or same-sex partner (joined through civil partnership) enters into a "Parental Responsibility Agreement" with the consent of everyone who already has Parental Responsibility,
- anyone: through being granted an Adoption Order, Residence Order or a Special Guardianship Order by a court,

- by being appointed a "testamentary guardian" in the signed will of someone with Parental Responsibility. Parental Responsibility cannot be lost or amended except by the making of an Adoption Order or through a limitation, not removal, imposed by a Care Order.

### ***2.7.2 The priority of child welfare***

Attitudes to, and contact with, parents will be non-judgemental in order to obtain the most effective working relationship. The priority is the needs of the child and we recognise that effective liaison is crucial for this.

### ***2.7.3 Different cultures***

We also recognise that families from different backgrounds and cultures will have different approaches to child rearing. These differences will be respected, provided they do not place the child at risk.

## **2.8 Record keeping**

The following procedures and responsibilities will be observed:

### ***2.8.1 Confidentiality***

Members of staff should never promise confidentiality. Time should be taken to reassure a child and confirm that the information given will be treated sensitively. Information should only be given to the appropriate person (DSL/DP). Members of staff, other than the DSL/DP and those involved closely, should only have enough details in order to help them act sensitively and appropriately to a pupil. Discretion should be used when talking about the personal and changing circumstances of children.

### ***2.8.2 Disclosure Form or a Log of Concern Form***

Once a teacher has a cause for concern about a child, he/she should immediately create a record of concern using the Disclosure Form for a Log of Concern Form found in the staff room. The completed form should be given to the DSL/DP.

### ***2.8.3 Whistleblowing and Record Keeping***

An initial disclosure against a member of staff should be carefully recorded in the same way. Thorough notes of all subsequent actions in relation to that allegation should be stored in the usual way, unless it involves the DSL/Headteacher. If an allegation is found to be malicious, all records pertaining to the case should be destroyed. If an allegation is substantiated, a comprehensive summary of the case and all actions taken should be stored in the staff member's confidential and secure personnel file and stored securely for at least 10 years after the incident.

### ***2.8.4 Welfare Files and Child Protection Files***

Two different types of files are maintained securely: Welfare Files and Child Protection Files. Welfare Files store information from Disclosures or Log of Concern Forms, and where the case has not been escalated up to Social Care. Where a case has been escalated and taken on by Social Care, the Welfare File becomes a Child Protection File and the pupil's main school file is marked differently to show this change of status.

### ***2.8.5 Secure Filing***

Welfare Files and Child Protection Files are to be kept securely by the DSL and separately from educational records. They may only be accessed by the DSL and the DPs. When a Welfare File or a Child Protection File is created for a pupil, the pupil's main file in the office is clearly marked to indicate which type of file is in existence.

On the creation and appropriate maintenance of Child Protection Files, see 'Guidance to schools on keeping and auditing child protection records' (Cambridgeshire County Council).

### ***2.8.6 Information sharing***

Heritage staff members have a professional responsibility to share relevant information about the protection of children with the investigative agencies. Social Services will inform Heritage when receiving a child with a Child Protection Plan and accompanying records should follow from the child's

previous school. If a pupil with a Child Protection File transfers away from Heritage, all efforts will be made to identify the school to which the child will be attending and ensure that his/her records are sent on.

### **2.9 Supervision**

Staff at Heritage working with children for whom we maintain a Welfare File or a Child Protection File will have the opportunity to discuss any causes for concern they may have. It is the responsibility of the DSL and DPs to ensure there are regular opportunities for teachers concerned to discuss their concerns.

### **2.10 Missing children**

The school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of ten school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

### **3. Review Date**

This policy will be reviewed on an annual basis or earlier as required. Trustees accept their responsibility to ensure adherence to this policy and their responsibility to liaise with the appropriate agencies (noted above) in the event of an allegation against the Headmaster or other senior managers.

|               |                |
|---------------|----------------|
| Authorised by | Jason Fletcher |
| Date          | January 2021   |

|                              |                               |
|------------------------------|-------------------------------|
| Effective date of the policy | January 2021                  |
| Review date                  | September 2021                |
| Circulation                  | Staff and parents via website |

## **Appendix A - Guidance on Recognising and Responding to Suspected Abuse**

Child abuse is a term used to describe ways in which children are harmed by someone, often in a position of power. It is important to recognise that pupils with Special Educational Needs or Disability (SEN/D pupils) are often particularly vulnerable and that additional barriers (e.g. communication barriers) may exist when seeking to determine whether there has been abuse and neglect.

Abuse could be carried out by an adult, adults or another child or children. All staff members need to be alert to the signs of abuse as detailed below.

### **Physical Abuse**

This can include hitting, shaking, throwing, poisoning, burning, drowning, scalding, suffocating or causing any form of 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. Possible signs include:

- unexplained injuries or burns
- refusal to discuss injuries
- improbable explanations of injuries
- untreated injuries or lingering injuries
- admission of punishment which appears excessive
- shrinking from physical contact
- fear of returning home or parents being contacted
- fear of undressing
- fear of medical help
- aggression / bullying
- running away
- significant changes in behaviour
- deterioration in work
- unexplained pattern of absences.

### **Emotional Abuse**

This is persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It can include:

- conveying to a child that they are worthless or unloved
- placing inappropriate age-related expectations on children
- making children feel frightened or in danger on a frequent basis
- exposing a child to domestic violence, even if that violence is not directed at the child

Possible signs include:

- continual self-deprecation
- fear of new situations
- inappropriate emotional responses to painful situations
- self-harm or mutilation
- compulsive stealing / scrounging
- drug / solvent abuse
- 'neurotic' behaviour - obsessive rocking, thumb sucking
- air of detachment 'don't care' attitude
- social isolation
- attention seeking behaviour
- eating problems
- depression, withdrawal.

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, whether or not the child is aware of what is happening. It can include non-contact activities such as involving

children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Possible signs include:

- bruises, scratches, burns or bite marks
- scratches abrasions or persistent infection in the anal or genital regions
- pregnancy
- sexual awareness inappropriate to the child's age
- frequent public masturbation
- attempts to teach other children about sexual activity
- refusing to stay with certain people or go to certain places
- aggressiveness, anger, anxiety, tearfulness
- withdrawal from friends.

Cambridgeshire Sexual Behaviour Service works with children and young people aged from 5-17 years old who are displaying sexually harmful or sexualised behaviour. Any concerns in this area should be referred to the DSL who will contact the service for advice on whether a referral is necessary.

Our Acceptable and Safe Use of Screens Policy identifies sexting as a common form of peer on peer abuse. It is essential that staff managing a disclosure should never view or forward illegal images of a child.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and or psychological needs and can affect the child's health and development. It might include failure to provide adequate food, shelter and clothing, failure to protect a child from physical harm or danger, failure to ensure appropriate access to medical care and treatment. Possible signs include:

- constant hunger
- poor personal hygiene
- inappropriate clothing
- frequent lateness or non-attendance
- untreated medical problems
- low self esteem
- poor social relationships
- compulsive stealing or scrounging
- constant tiredness.

### **Online Abuse**

Various forms of online abuse pose a risk to our pupils. Abuse can take place wholly online or it can lead to other forms of abuse outside of the online context. It can include online grooming leading e.g. to financial exploitation, sexual exploitation or radicalisation. It can take place e.g. via social media sites, chatrooms, or through gaming. Risks can also be associated with GPS location trackers on smartphones or webcams. Cyber-bullying is very common, as young people tend to be less restrained in what they will say to each other online (or via social media) than they would be face-to-face. Particular regard should be paid to sexting and evidence of 'banter' (i.e. teasing remarks that could become or be perceived as bullying). Cyber-bullying can also involve inappropriate images of a sexual nature (sexting). The distress caused by cyber-bullying or sexting can be severe. Teachers should be alert to conversations in school which indicate that a pupil may be subject to or perpetrating abuse online. It should be noted that staff managing a disclosure should never view or forward illegal images of a child. Please see our Acceptable and Safe Use of Screens Policy for more information, where the school's policy regarding the use of devices is explained, particularly that pupils are not permitted to make use of smart phones during school hours or on school trips.

### **Peer-on-Peer Abuse**

Peer-on-peer abuse can take different forms such as banter, cyber-bullying, sexting (see also Online Abuse above), other forms of sexual harassment and violence or abuse, physical abuse, upskirting or

hazing/initiation type rituals. Evidence shows that girls, children with SEND and LGBT children are particularly at risk. Abuse should never be tolerated or passed off as 'banter' or 'part of growing up'. When peer-on-peer abuse is disclosed it is important that all victims are reassured that they are being taken seriously. A victim should never be made to feel ashamed for making a report. See 2.4.1 above for guidance on effective listening. See also KCSIE 2019 Part 5 for further information about handling peer-on-peer sexual harassment or abuse. As noted in 1.3 and 1.4 above, effective pastoral care and an effective PSHE programme plays a key role in preventing peer-on-peer abuse and creating a culture of mutual respect. Where it becomes clear that a child is concerned by peer-to-peer abuse these should be referred to the DSL. Such concerns will be considered initially in accordance with our Anti-Bullying Policy, Behaviour Policy or our Acceptable and Safe Use of Screens Policy and all incidents and evidence recorded accordingly. However, where the DSL believes there is reasonable cause to suspect that the child is suffering or is likely to suffer significant harm, the DSL will refer the case to local agencies. It should be noted that both the victim and perpetrator should be considered at risk and supported accordingly.

### **Self Harm**

If it comes to the attention of any member of staff that a child is self-harming, they should alert the DSL as soon as possible. Actions by the DSL might include:

- contacting parents
- contacting Child Adolescent Mental Health Services
- contacting Social Services if the child meets the referral criteria.

### **Living with Domestic Abuse**

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial and emotional abuse. Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant harm which they may carry with them into their adult life and relationships. Staff will follow the procedures outlined in this policy and the welfare of any children living in domestic abuse households will be closely monitored, referring to Children's Social Care as required.

### **Young carers**

These are children who are living in a home environment which requires them to act as a young carer for a family member or a friend who is ill, disabled or misuses drugs or alcohol. It can increase their vulnerability and they may need additional support and protection. Staff need to be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required.

### **Serious violence and County Lines Trafficking**

This refers to drug networks or gangs who groom young people to carry drugs and money from urban areas to surrounding towns and rural areas. Because Cambridge is comparatively wealthy, it is a prime target for London-based gangs. Involvement with gangs often begins gradually, e.g. by doing a 'favour' for a 'friend of a friend' met at a party. Young people can quickly find themselves out of their depth. Exploitation will use enticement-based methods, but it is often accompanied by violence or threats of violence. All exploitation involves power imbalance. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. A pupil involved in county lines trafficking may miss school more often or display signs of distress. If you have any concerns, refer the matter to the DSL/DPs. A referral to the Police, Social Care or the National Referral Mechanism may be appropriate.

### **Children at Risk of Child Sexual Exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under

the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child exploitation does not always involve physical contact; it can occur through the use of technology. If concerns about child sexual exploitation arise, staff must follow the procedures outlined in this policy. The DSL/DP will complete the LSCB Child Exploitation Checklist and refer to Children's Social Care.

### **Forced Marriage and Honour Based Violence (HBV)**

A dedicated hotline - Choice Hotline - at Cambridge Police was established in 2008 to offer confidential advice where there is a suspicion that a child may be at risk of a forced marriage or honour based violence. It is staffed by white female police officers and is available 24/7. Staff or children can call the hotline for guidance and support. Choice Hotline: 0800 5 999 818 FREE

### **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. If staff have a concern they should immediately inform the DSL/DPs. Where a teacher discovers that an act of FGM appears to have been carried out on a girl (either through disclosure by the victim or visual evidence) who is aged under 18, there is a statutory duty to report it to the police (Child Abuse Investigation Unit of the Cambridgeshire Constabulary, 01480 847743).

### **Preventing Radicalisation**

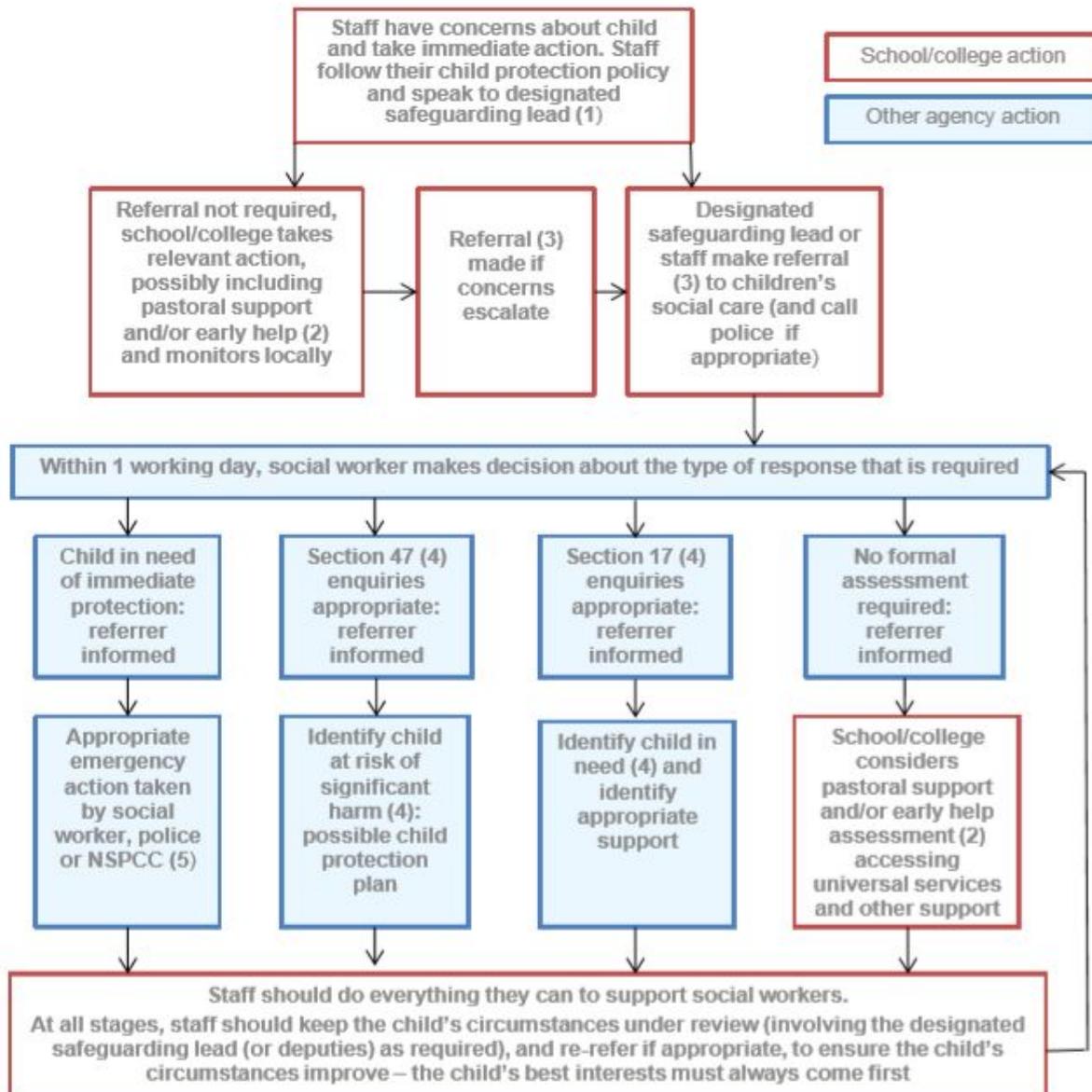
Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection and report any such concerns to the DSL/DPs. A referral may be made to the Channel Programme. If a member of staff has an urgent concern they should contact the local police force by dialling 101 and asking for the Prevent Team, or for urgent police assistance dial 999. See our separate Preventing Extremism Policy for more information.

### **Contextual Safeguarding**

Young people are vulnerable to violence and abuse in a range of social contexts outside the home, both in their neighbourhoods, and online. KCSIE advises that when completing social care assessments, schools should consider wider environmental factors and provide as much information as possible as part of the referral process. *"This will allow any assessment to consider all the available evidence and the full context of any abuse."*

## Appendix B

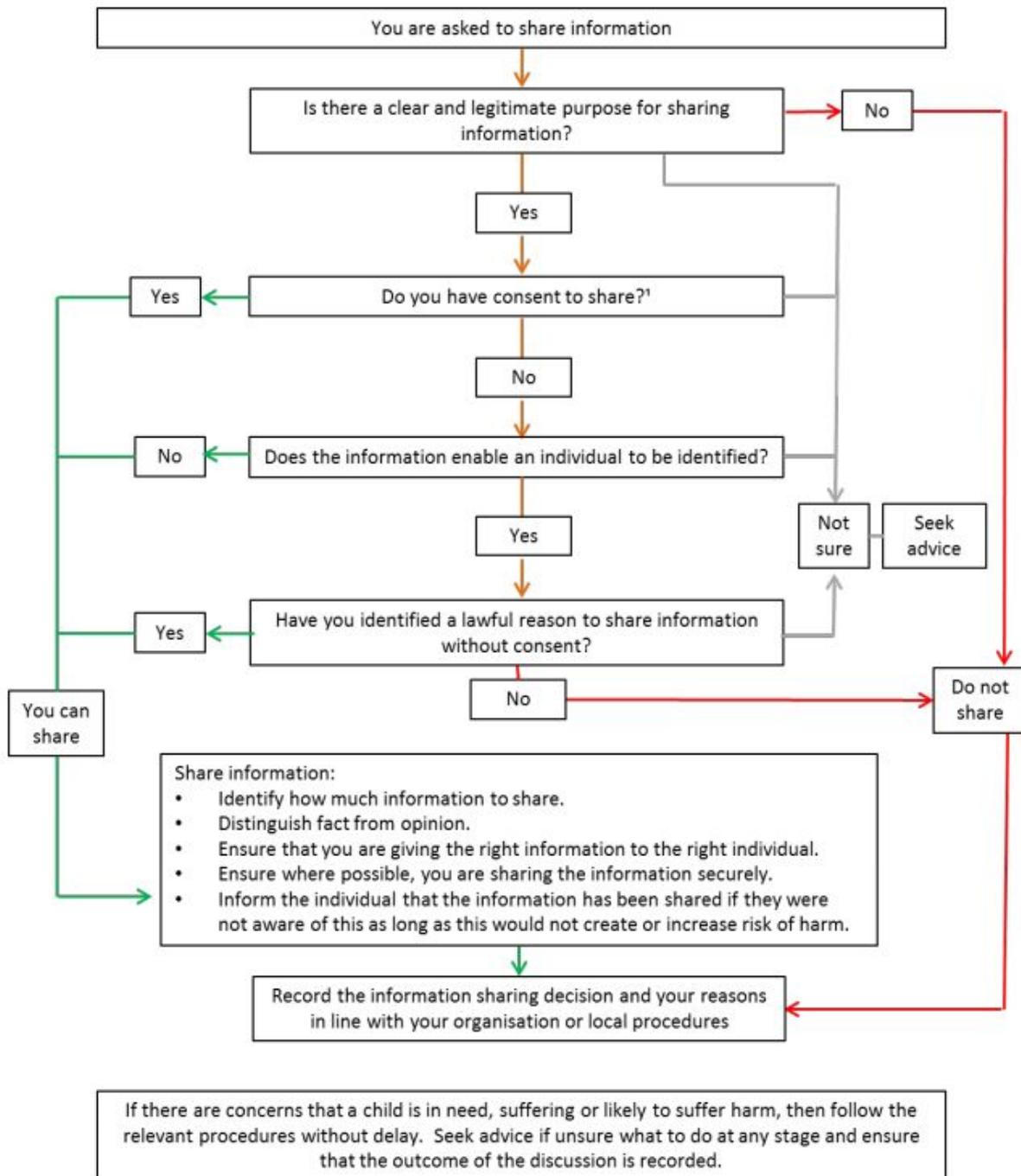
### Actions where there are concerns about a child



## **Appendix C - Seven Golden Rules for Information Sharing**

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom the information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up- to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## Appendix D - When and How to Share Information



1. Consent must be unambiguous, freely given and may be withdrawn at any time