

## 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. Harm or abuse does not occur solely from an adult to a child; this policy also encompasses all forms of child-on-child abuse, including sexual violence and sexual harassment. It is important to recognise that pupils with Special Educational Needs or Disability (SEND) are often particularly vulnerable and that additional barriers may exist for such pupils (e.g. communication barriers) that can make it harder to determine whether there has been abuse and neglect.

All school staff have a responsibility to identify children who may be in need 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.

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 on our website. Parents who wish to view the Code of Conduct for Staff may request to do so in the school office.

This policy explains:

1. prevention strategies,
2. procedures for dealing with safeguarding concerns,
3. guidance on recognising abuse (Appendix A).

It draws upon the annually updated Department for Education guidance Keeping Children Safe in Education. 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 school policies that are closely related to this policy are the Preventing Extremism Policy and the Recruitment Selection and Disclosure Policy.

The legislation that governs our practices with respect to safeguarding 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 (CPSCPB) 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 Integrated Care Board](#).

This policy refers to Children's Social Care to describe the local authority with oversight for safeguarding and to whom referrals are made, and the Local Authority Designated Officer (LADO) as the point of contact in the local authority to whom allegations against staff should be referred.

Heritage School accesses training on a regular basis for its Designated Safeguarding Lead (DSL) and its Deputy Designated Safeguarding Leads (DDSLs).

## **1. Prevention**

Heritage School seeks to prevent significant harm through effective induction and training of staff, including with reference to our Staff Code of Conduct, effective pastoral care and effective teaching of personal, social, health and emotional education.

### **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 DDSL) to review this policy. Safeguarding induction will cover the following:

- The following policies which relate to Safeguarding:
  - Recruitment, Selection and Disclosure Policy,
  - Code of Conduct of Staff,
  - Acceptable Use of Screens Policy,
  - Children Missing Education Policy,
  - Behaviour Policy,
- Safer working practices,
- How safeguarding is managed, including the responsibilities of the DSL and DDSL,
- How the Board of Trustees exercises oversight for Safeguarding at Heritage School, including effective online safety and effective filtering and monitoring,
- The school's procedures for dealing with and referring concerns, in accordance with locally agreed procedures,
- Contact details for making a referral,
- The early help process,
- Reviewing types of abuse identified in Annex A of this policy and Annex B of KCSIE,
- The school's arrangements for dealing with child-on-child abuse, including sexting and any other relevant issues, and how victims and perpetrators will be supported,
- The school's arrangements for dealing with online safety and its Acceptable and Safe Use of Screens Policy, including the use of phones and cameras in EYFS,
- The school's arrangements for dealing with allegations of abuse against staff, volunteers or contractors, including the Headmaster, and how perpetrators will be supported.

Prior to commencing work with pupils, and once per year thereafter, every staff member and Trustee is expected to read this policy, the Code of Conduct for Staff, KCSIE Part 1, and KCSIE Annex B, and sign a form declaring they have read these documents, understand them and agree to adhere to them.

Induction training for new staff and Trustees also includes the Preventing Extremism Policy and the Acceptable Use of Screens Policy.

Refresher training for all staff will take place regularly at least annually, with further updates as required.

Staff regularly involved with recruitment will be directed to our Recruitment, Selection and Disclosure Policy and will undergo relevant training.

## **1.2 Safer Working Practices**

In order to ensure the safeguarding of our pupils, staff are expected to adhere to the following guidance.

### **1.2.1 Code of Conduct for Staff**

Trustees and staff are expected to understand and adhere at all times to our Code of Conduct for Staff. The Code of Conduct for Staff details a wide range of specific safer working practices and must be read in association with this policy. It is designed to encourage the highest standards of professionalism. Adherence to it will reduce the risk of abuse or a false allegation of abuse.

A copy of the Code of Conduct for Staff will be made available to parents upon request to the School Office.

### **1.2.2 Use of mobile phones and cameras**

The EYFS Statutory Framework requires us to state our policy regarding the use of personal mobile devices or personal cameras in our Safeguarding Policy. Staff are only allowed to photograph children using school equipment. Staff must not use their mobile phones or a personal camera to take photographs of children at school unless specifically authorised to do so by the Headmaster and in keeping with our Code of Conduct for Staff and our Use of Images Policy.

### **1.2.3 Site security**

Entry to school premises is controlled by doors that are secured physically. It is the responsibility of staff to ensure that as they leave the premises, including with pupils (e.g. to go to a PE lesson or on an enrichment trip), that doors are closed and locked behind them.

No internal doors to places used by pupils should be locked whilst pupils are present in these areas.

When pupils are on site, authorised visitors to the school must sign in and out at the school office, wear a visitor lanyard at all times and be supervised at all times. Visitors without a school lanyard should 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 should be reported to the Headmaster and school office or reported directly to the police.

### **1.2.4 Safer Recruitment**

Staff must not permit anyone to work with pupils who have not been approved to do so by the Bursar. The Bursar is responsible for safer recruitment at Heritage School. This applies during activities delivered on site, or self-directed activities (such as nature walks) in the local area. On trips, only paid or volunteer staff vetted by the venue should teach pupils or lead activities for pupils.

Staff need to exercise special care with volunteers, such as parents, or visiting speakers. At a minimum, proof of identity must be presented at the school office upon arrival. For visiting speakers, in keeping with our Preventing Extremism Policy and our Active Promotion of Fundamental British Values Policy, an internet search is undertaken and recorded to ensure there are no grounds to be concerned that the visiting speaker will promote extremist or radical views.

Staff should refer to the [Recruitment, Selection and Disclosure Policy](#) for more information about checks necessary for volunteers, visiting speakers, visiting professionals, etc.

As a rule, staff are responsible to supervise pupils at all times, and should only deviate from this rule where they are confident that another adult volunteer, speaker or professional has been thoroughly vetted prior to working with our pupils.

#### **1.2.5 Pupil collection at end of day**

Staff must ensure that Infant and Junior pupils (Lower Prep to Year 6) are released only into the care of those with parental responsibility or someone acting with their prior consent. We make an exception to this rule: assuming we have no concerns of our own, we permit Year 5 and 6 pupils to leave independently if parents have given their permission by email for them to do so, either as a one-off or as a regular arrangement. We assume that Senior School pupils (Year 7+) will leave the site independently, unless otherwise agreed with parents.

#### **1.2.6 Whistleblowing (see also our separate Whistleblowing Policy)**

The safety of children is paramount. Staff 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 2.5 below for specific information about how to handle allegations against staff, including against the Headmaster. If the safety of a child is compromised by the actions of any member of staff, contact the DSL immediately (or the DDSL or the Chair of Trustees if the allegation concerns the Headmaster) and the DSL will determine how and when to speak to the member of staff. Please note that any member of staff can make a referral to the LADO if the school is failing to address concerns appropriately.

#### **1.3 Pastoral care**

All staff, teachers and TAs in particular, have a responsibility for the pastoral needs of pupils. 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 SEND and vulnerable children.

#### **1.4 Mental Health Awareness**

All staff should 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. 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 DSL or DDSL.

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)

## **1.5 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 activity (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 child-on-child 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

## **1.6 Online Safety**

It is essential that children are protected from potentially harmful and inappropriate online material. Heritage School takes an active whole-school approach to online safety. See our Acceptable Use of Screens Policy for more information.

### **1.6.1 Online abuse**

As stated in Appendix A of this policy, the school recognises that online abuse is a significant risk to children and young people. This includes being exposed to illegal, inappropriate or harmful content (particularly pornography) and having contact with harmful people online who can try to take advantage of young people financially or sexually, for example. Pupils are also taught to recognise inappropriate conduct online, e.g. forms of child-on-child abuse such as online bullying or sexting, and how to get help if they are the victim of any form of online abuse.

### **1.6.2 Promoting online safety**

The school is committed to promoting a culture that prioritises real world relationships and activities over screen-based ones. Ours is an intentionally low-tech learning environment.

Specific measures include:

- The school does not make use of screens in routine teaching, apart from Computer Science lessons from Year 6.
- We do not supply pupils with ipads or tablets and we do not make use of interactive whiteboards; routine teaching methods are traditional.
- Pupils are not permitted to have their own devices while at school and are required to have explicit parental permission to bring a phone to school (for safety reasons) and must hand in phones at registration time.
- We teach pupils, in ways appropriate to their age, about online safety through our RSE and PSHE curriculum.
- Senior pupils are asked to sign the Screen Use Agreement with Pupils, which is designed to promote ownership by pupils of their own screen use, including online safety.
- We seek to establish a partnership with parents via our Screen Use Agreement with Parents, by which they commit to regulating screen content and screen time outside of school hours.
- We encourage parents to delay giving smartphones to their children until at least age 14-16.

- We have an annual Screen Free Week, and other digital detox opportunities.

### **1.6.3 Content filtering and monitoring – roles and responsibilities**

The school has appropriate filtering and monitoring systems in place to protect all users at Heritage School from inappropriate or harmful content while using devices on the school's network.

The DSL is responsible for ensuring:

- that adequate technical systems are in place,
- that relevant protocols are understood by staff,
- that the filtering and monitoring systems are checked regularly and reviewed at least annually,
- that records are kept of checks and the annual review.

The Safeguarding Trustee and the Headmaster are responsible for evaluating whether school systems comply with regulations, with particular reference to KSCIE and [the DfE filtering and monitoring standards](#).

### **1.6.4 Content filtering**

The school's filtering system provides a safe environment in which pupils can learn. Appropriate filtering for an educational setting applies to all users. The school's current filtering provider:

- is a member of Internet Watch Foundation (IWF)
- is signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- blocks access to illegal content including child sexual abuse material (CSAM)
- handles multilingual web content, images, common misspellings and abbreviations,
- identifies technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them,
- provides alerts where an attempt has been made to access inappropriate content.

If staff need access to online content for teaching purposes that is blocked by existing filters, they must request access to the relevant website(s) in writing to the DSL, stating their reasons clearly. The DSL will record the request and the decision taken.

### **1.6.5 Monitoring access to inappropriate content**

Our use of devices and the internet for teaching purposes is limited to very few contexts. When screens are used in lessons teachers are expected to maintain direct visual supervision of pupil screen activity to ensure that pupils are on task and are not accessing harmful content (e.g. in Computer Science lessons all screens face toward the centre of the room).

All staff who are supervising pupils working online must inform the DSL if:

- they witness or suspect unsuitable material has been accessed,
- they can access unsuitable material,
- they are teaching a topic using internet which could create unusual activity on the filtering logs,
- there is failure in the software or abuse of the system,
- they notice abbreviations or misspellings that allow access to restricted material,
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks.

In addition, the school has an automated technical monitoring system in place. This generates an alert and a screenshot to the Safeguarding Team when a user attempts to access inappropriate content. The user is identified, making immediate follow up possible.

## **2. How to Respond to Abuse or Suspected Abuse**

### **2.1 Who is responsible**

The Designated Safeguarding Lead (DSL) is:

- J W Fletcher, Headmaster

The Deputy Designated Safeguarding Leads (DDSLs) are:

- M Fox, Deputy Head
- B Scarlata, Head of PSHE and Enrichment

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 safeguarding files to new schools/colleges as soon as possible and within 5 days of the start of term or after an in-year transfer for a pupil who leaves the school,
- organising training on safeguarding within the school,
- ensuring that our PSHE and RE/RSE programme effectively teaches pupils how to keep themselves safe, including with respect to online safety.
- ensuring online safety on the school site and during all school activities.

Jason Fletcher (DSL), in conjunction with the Head of Infants, has special responsibility for the operation of this policy with respect to EYFS.

Bettina Scarlata (DDSL) is our Mental Health Lead, with responsibility for raising awareness among staff and pupils, and ensuring, together with the safeguarding team, that pupils experiencing mental health challenges are effectively supported and referred to external agencies where necessary. She also monitors the welfare of looked after or previously looked after children.

The DSL and DDSLs 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 using Educare.

Trustees hold the ultimate responsibility for ensuring that safeguarding concerns are dealt with in accordance with this policy. A designated Safeguarding Trustee (currently F Hough) is responsible to oversee the content and operation of this policy. The Safeguarding Trustee undertakes an annual review in the Autumn Term and reports to the whole board of Trustees each year at their fourth quarter meeting. The Safeguarding Trustee liaises with staff as required throughout the year. Safeguarding is a standing item at every meeting of Trustees. Parents or staff can contact the Safeguarding Trustee (or any other Trustee) at any time with concerns they may have; contact details can be obtained from the school office.

## **2.2 Contacting the DSL and DDSL**

The DSL and/or DDSL is usually onsite at all times. Whenever the DSL, who works full time, and DDSL are off site, the school office will know how to make contact with them. If the office cannot contact them, they will direct you to speak to Jean Carter (Head of Infants). Contact details for the DSL and DDSL (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 Headmaster.

If urgent safeguarding concerns arise out of business hours, staff should contact the DSL immediately. If a parent needs to raise an urgent safeguarding concern out of normal business hours, they can contact any staff member who will know how to reach the DSL. If the matter is sufficiently urgent, the parent should contact Cambridgeshire Children's Social Care Services directly (0345 045 5203, Mon-Fri 0800-1800, or 01733 234724 out of hours). Or, if there is an immediate threat of harm to the child, parents should contact the Child Abuse Investigation Unit of the Cambridgeshire Constabulary (01480 847743) or dial 999 and alert the police.

## **2.3 Responding to a disclosure of abuse or a safeguarding concern**

Staff need to be prepared for a child to disclose information about potential or actual abuse. This can include any form of child-on-child abuse. There is a current strong emphasis upon addressing

child-on-child sexual violence and sexual harassment. Information may be disclosed in response to an appropriately broad question or it could be entirely unsolicited.

### **2.3.1 Effective listening**

The initial response to a disclosure of abuse by a child, including a report of sexual violence or sexual harassment, is incredibly important. With child-on-child abuse where the alleged perpetrator is also in the school there is particular sensitivity: how the school responds can encourage or undermine the confidence of future victims of abuse to come forward.

Staff should:

- Listen to the pupil, keeping calm and offering reassurance that they are doing the right thing, that you recognise how hard it is for them, and that you are taking their concerns seriously.
- Regardless of how long it has taken them to come forward, reassure them that they will be supported and kept safe; this is particularly important with child-on-child abuse as the alleged perpetrator may be in the school.
- Never give the impression that they are creating a problem by reporting any form of child-on-child abuse, including sexual violence or sexual harassment.
- Let the child lead the conversation. Do not press for details. Ask open or broad questions.
- Don't lay the blame or criticise either the child or the alleged perpetrator.
- Don't promise confidentiality; explain that you will need to tell others and why.
- Observe bruises or other physical signs, but do not ask a child to remove or adjust their clothing to observe them.
- Don't promise that you can 'fix things' easily or immediately.
- In cases involving online abuse or sexual harassment, never view or forward images of a child. To do so can be a criminal offence. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- Remember that a victim may not disclose the whole situation immediately or fully at first.
- Keep in mind that certain children may face additional barriers to telling someone about abuse because of a vulnerability in relation to disability, sex, ethnicity, sexual orientation, etc.

### **2.3.2 Immediate recording**

It is essential that staff record safeguarding concerns immediately, in note form if necessary, then onto our online safeguarding software, MyConcern.

When recording the disclosure on MyConcern, 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.

### **2.3.3 Initial response**

Having received notification of a disclosure of abuse or potential abuse, or of any form of safeguarding concern, the safeguarding team will discuss the case and will consider four potential responses:

1. Internal management and monitoring: it may be appropriate to manage the alleged incident internally. Alleged child-on-child abuse incidents may be best managed under the Behaviour Policy and Anti-Bullying Policy.
2. Early Help: in other cases, it might be judged that children and their families would benefit from the Early Help Hub. See below for more information.
3. Referral to Children's Social Care: where a child has been harmed, is at risk of harm or is in immediate danger, schools must make a referral to Children's Social Care.
4. Reporting to the police: if a child is in immediate danger, the police must be called. Ordinarily, the decision to call the police would be made in conversation with Children's Social Care,

including in cases where there may have been a criminal offence. See Appendix A for information about criminal offences in relation to sexual violence or sexual harassment.

#### **2.3.4 Internal investigations**

After the initial disclosure, staff may need to investigate further to establish the facts as far as possible. This will often be appropriate, for example, in cases of alleged child-on-child abuse. If it is clear that a child has been harmed, is at risk of harm or is in immediate danger, Children's Social Care and/or the police will be contacted immediately; no investigation should be attempted without taking guidance first. Where it is appropriate to conduct an investigation, staff should take care to ensure that any future police investigation is not jeopardised.

Investigations into safeguarding concerns, as distinct, for example, from routine behaviour incidents, should be conducted with two members of staff present. This will be particularly important when investigating alleged child-on-child sexual violence or sexual harassment, or alleged abuse by a staff member. However, depending upon the circumstances, it may be more appropriate for the second staff member to be in the immediate vicinity, e.g. on the other side of a room or within earshot with the doors open. If the investigation involves a pupil with SEND, the SENDCo will be consulted throughout the investigation.

Information gathered from internal investigations must be immediately and thoroughly documented.

#### **2.3.5 Allegations of child-on-child abuse**

Where there is a disclosure of child-on-child abuse, including sexual violence or sexual harassment, the safeguarding team will immediately take appropriate action to ensure the safety and welfare of all pupils involved. This will include both the alleged victim and the alleged perpetrator. Internal investigations will be conducted as necessary and as a matter of urgency.

When considering allegations of child-on-child abuse the ages and stages of the children will be weighed carefully to ensure the response is proportionate and that support is tailored appropriately on a case by-case basis. For example, the response to a one-off incident of sexualised name-calling will be vastly different from that for a report of rape.

The safeguarding team will undertake an immediate risk and needs assessment. They will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, adult students and staff), and any actions that are appropriate to protect them from the alleged perpetrator(s).

Where necessary, the school will take advice from Children's Social Care and/or the police, as appropriate, about how an investigation into allegations should be conducted and how to inform the pupil about the allegations. If it is necessary for a pupil to be interviewed by the police in relation to an allegation of abuse, the school will ensure that, subject to the advice of Children's Social Care, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult.

A pupil against whom an allegation of abuse has been made may, if the risk and needs assessment warrants it and subject to discussion with Children's Social Care, be suspended as a neutral measure that implies neither guilt nor innocence during an investigation.

The school will engage with both the victim's and the alleged perpetrator's parents, unless there is a reason to believe that doing so will put a child at additional risk. The school will meet with the victim's parents to discuss their wishes and arrangements to safeguard the victim. The school will also meet with the alleged perpetrator's parents to discuss arrangements that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. Support arrangements for the alleged perpetrator will also be discussed. The school will

communicate formally with parents at least weekly to update them on progress for not less than four term-time weeks after the alleged incident; by mutual agreement weekly updates could be curtailed sooner or extended for longer.

At the same time, the school will impose sanctions in keeping with its Behaviour Policy upon the perpetrator, where it has concluded, on the balance of probabilities, that a pupil's behaviour warrants it. Severe child-on-child abuse will be treated as a Serious Incident and is likely to result in a temporary suspension or permanent exclusion. The school reserves the right to impose disciplinary sanctions even if another body is conducting an investigation into an incident.

### **2.3.6 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.

## **2.4 Involving 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.

### **2.4.1 Referral or not?**

Upon receipt of information on MyConcern, the safeguarding team will, as noted above, decide whether to contact local authorities.

Whilst the DSL or DDSL will usually manage referrals, any staff member can refer their concerns to Children's Social Care Services directly. If staff have significant concerns about how the safeguarding team is handling a case they can refer their concerns to Children's Social Care.

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

Ordinarily the safeguarding team will contact the parents/carers before a referral to Cambridgeshire Children's Social Care Services 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 as failing to do so is likely to create tension in the relationship with those parents.

### **2.4.3 Whom to call: Children's Social Care or Police?**

If the safeguarding team considers a referral necessary the DSL or DDSL 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 risk of harm to the child, the DSL or DDSL 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, who will, in turn, give advice about whether to contact the police.

Where it is judged by the safeguarding team that Early Help is required, the DSL or DDSL will contact Cambridgeshire Children's Social Services (see 2.4.5 below).

### **2.4.4 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 if necessary, 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 specialists 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. A case worker is assigned who will gather 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 ongoing 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, 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.

#### **2.4.5 Early Help**

Early Help involves providing support for families as soon as a problem emerges in the hope of preventing further problems arising later.

If the safeguarding team considers Early Help necessary, they will discuss this with the family, as their willing participation is essential. If the family agrees, the safeguarding team will seek to organise an Early Help Assessment (EHA) by an appropriately trained and qualified professional.

The EHA will be sent to the Early Help Hub. This is a team which will decide which service(s) will be best to support the family's needs. The Early Help Hub will look at the assessment and, if relevant, possibly talk to other professionals. If there are several professionals involved, one person will become the 'lead professional' and will coordinate the work of the other services and be the family's point of contact.

More information about Early Help in Cambridgeshire can be found [here](#).

### **2.5 Allegations against staff, volunteers, contractors, or third party users**

#### **2.5.1 A culture of openness**

As noted in 1.2.11 above, staff have an obligation immediately to share with the DSL or DDSL any concerns they may have about the behaviour of other staff, volunteers or contractors. These same procedures will be followed in relation to any concerns about behaviour by third party organisations or individuals who use the school's premises for the purpose of running activities for children.

Staff are strongly encouraged to self-refer to the Headmaster if they believe their actions toward a pupil may have crossed the harm threshold or constituted a low level safeguarding concern, or could potentially be misinterpreted as such.

Staff can 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 (0800 0280285 from 8am to 8pm Monday to Friday or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).

Staff are also advised to contact Local Authority Designated Officer (LADO) if they have concerns about the way a case is being handled by the school.

#### **2.5.2 Allegations against the Headmaster**

If a member of staff has reason to believe that the Headmaster has harmed or poses a risk of causing harm to children, they should immediately contact the Chair of Trustees via the school office. In this circumstance, the Chair of Trustees will act as the case manager, and, as such, will take action together with the safeguarding team in keeping with this policy.

### **2.5.3 Reporting criteria and initial response**

Allegations against staff, volunteers or contractors will be dealt with using common sense and good judgement. However, they must be treated as a matter of urgency. Immediate action may be necessary to protect children at risk.

Upon hearing an allegation, the case manager (usually the DSL, or the Chair of Trustees if the allegation involves the Headmaster) will meet immediately with the safeguarding team (DDSL) to consider the allegation with reference to Appendix A of this policy and KCSIE. They will determine whether the harm threshold has been met. If an allegation does not meet the harm threshold it will be treated as a low level concern.

If the case manager and safeguarding team believe that the harm threshold may have been met, they will ensure that enquiries are undertaken to determine whether there is any foundation to the allegation. Care must be taken to ensure that any future police investigation is not jeopardised. Basic enquiries will consider, for example:

- Was the individual in the school at the time of the allegation?
- Could he/she have come into contact with the child?
- Are there any witnesses?

If the safeguarding team believes that the threshold has been met, the Trustee with responsibility for safeguarding and the Chair of Trustees will be kept appropriately informed about the case and its progress.

### **2.5.4 The harm threshold**

Considered in the light of Appendix A and KCSIE, the harm threshold is met if a staff member, volunteer or contractor has:

- behaved in a way that has harmed a child, or may have harmed a child, and/or;
- possibly committed a criminal offence against or related to a child, and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Harmful behaviour outside of the school environment is equally serious and can make an individual unsuitable to continue working with children.

### **2.5.5 Low level concerns**

A low level concern is not insignificant. It is any concern that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of school; and
- does not meet the harm threshold or is otherwise not considered serious enough to warrant a referral to the LADO.

Examples of low level concerns include but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that low level concerns are shared immediately with the Headmaster (who is also the DSL), and that they are recorded and dealt with appropriately. Doing so can help protect staff, volunteers or contractors from potentially false allegations or misunderstandings.

Investigations into low level concerns will be conducted by an appropriate senior member of staff, usually the DSL or DDSL. The DSL or DDSL will collect as much evidence as possible by speaking directly to the person who raised the concern as well as to the individual involved and any witnesses.

Where the nature or complexity of the allegation warrants it, and the capacity or suitability of the DSL or DDSL to investigate it is in question, further to discussion with Trustees, an independent investigator will be appointed.

#### ***2.5.6 Referral procedures for allegations that meet the harm threshold***

The case manager and safeguarding team must take immediate action to protect children who may be at risk. An allegation which meets the harm threshold must ordinarily be reported to the local authority (LADO) within one day of the allegations coming to light. It is imperative that all unnecessary delays are eradicated.

The DSL, DDSL or the Chair of Trustees, will make contact with the LADO on 01223 727967, Mon-Fri during opening hours, or 01733 234724 out of hours, and with the Police if the situation is an emergency.

Discussions with the LADO will consider the nature, content and context of the allegation and agree a course of action. This might include a recommendation to involve the Police. Discussions with LADO should be recorded in writing by the person making the referral.

#### ***2.5.7 Immediate suspension***

The DSL (or DDSL, or the Chair of Trustees) will consider with the LADO whether the circumstances of the case warrant immediate suspension. This should be seen as a last resort; it may be possible to put new arrangements in place to mitigate risk while further investigation is undertaken.

Suspension should only be considered in cases where there is cause to suspect a child at the school is at risk of harm, or if the case is so serious that it might constitute grounds for dismissal. 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 that he/she has effective support.

#### ***2.5.8 Further investigation and timescales***

Where investigation into an allegation that meets the harm threshold is necessary, further to the initial response, the case manager (DSL or Chair of Trustees) will discuss how this should be done with the LADO. The investigation will normally be undertaken by a senior member of staff (usually the DSL), although the LADO and/or the police may be involved.

Where the nature or complexity of the allegation warrants it, and the capacity or suitability of the DSL or DDSL to investigate it is in question, further to discussion with Trustees an independent investigator will be appointed.

The case manager will regularly review the progress of the investigation to ensure that it is thorough, evidence-based and fair, and that it is undertaken as quickly as possible. It is recognised that there may be factors outside the investigator's control that may affect progress, such as coordinating interview dates. An update on progress must be given by the case manager to the staff member at least weekly, preferably every three working days. A review by the safeguarding team should be conducted at least fortnightly. Dates for subsequent reviews should be set at each review meeting.

#### ***2.5.9 Supporting staff during an investigation***

The welfare of a child is paramount and will be the prime concern in an investigation against a person in a position of trust. However, when an allegation is being investigated it is likely to be a very stressful

experience for the adult subject of the investigation and, potentially, to their family members. The school will:

- inform the individual as soon as possible that an allegation has been made, explaining the likely course of action, guided by the LADO and/or the police as necessary;
- appoint a named representative to be the liaison person between the staff member and the case manager, and to provide pastoral support;
- advise the individual to contact their trade union representative, or a colleague or another independent person, for support;
- provide advice about accessing counselling or medical advice where appropriate;
- not seek to prevent social contact with colleagues, unless there is evidence to suggest such contact may prejudice the gathering of evidence;
- manage and minimise as far as possible the stress caused by the allegation.

#### ***2.5.10 Response to malicious allegations***

Where an accusation is found to be malicious, the Headmaster will consider, with Trustees as necessary, whether the child and/or the person who has made the allegation is in need of help and may have been abused by someone else. In such cases a referral to the LADO may be appropriate.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the person who made it as per our Behaviour Policy.

#### ***2.5.11 Confidentiality***

Information about an allegation or investigation should not be shared with anyone else not directly involved in or responsible for the investigation. Staff, trustees, parents, carers or children who are aware of an allegation will be made aware of their statutory requirement to maintain confidentiality and avoid unwanted publicity whilst investigations are in progress.

Reporting restrictions make it an offence (except in the limited circumstance expressly permitted by the legislation) for any person to publish any material that may lead to the identification of a teacher in a school as the subject of an allegation by, or on behalf of, a child from the same school.

#### ***2.5.12 Disciplinary action***

Where a member of staff has been found to have caused harm to a child or to pose a significant risk of harm, discussion between senior leaders and Trustees will take place and in conjunction with the LADO and the police (as necessary) about proportionate disciplinary action.

#### ***2.5.13 Informing external agencies***

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.

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.

Low level concerns about supply staff or contractors will be shared with their employers so any potential patterns of behaviour can be identified.

#### ***2.5.14 Record keeping and lessons learned***

Careful records will be kept regarding any allegations or low level concerns. These will record the details of the allegation/concern, the context in which it arose and any action taken, including discussions with the LADO. The name of the individual sharing their concerns will be noted, although if the individual wishes to remain anonymous this will be respected if possible. Records will be reviewed periodically by the DSL and DDSL so that potential patterns of concerning behaviour can be identified.

Any records pertaining to an allegation or low level concern will be preserved for the duration of a person's employment and in keeping with our Data Retention Policy.

Further to an allegation and investigation the case manager will determine with Trustees and the LADO, and the police (if appropriate), whether there are any improvements to be made to the school's procedures to help prevent similar events in the future.

## **2.6 Working with parents**

### **2.6.1 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 (unless legally relinquished eg. in the case of adoption),
- 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; again unless legally relinquished)

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.

### **2.6.2 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.

### **2.6.3 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.

## **2.7 Record keeping**

The following procedures and responsibilities will be observed:

### **2.7.1 Detailed, accurate, written records**

Once a teacher has a cause for concern about a child, he/she should immediately record that concern on MyConcern, the school's online safeguarding software. Staff are expected to remember the motto 'if it isn't written down, it didn't happen' and to keep clear, detailed, accurate, written records of concerns about children using MyConcern.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome;
- a record of any discussions or communications with parents, other agencies, etc.

### **2.7.2 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 or DDSL). Members of staff, other than the DSL or DDSL and those involved closely, should only have enough details in order to help them act sensitively and appropriately. Discretion should be used when talking about the personal circumstances of children.

### **2.7.3 Whistleblowing and Record Keeping (see also our separate Whistleblowing Policy)**

An initial disclosure against a member of staff will be carefully recorded by the Headmaster, or the Chair of Trustees if the concern relates to the Headmaster. Thorough notes of all subsequent actions in relation to that allegation will be stored securely.

If an allegation is found to be malicious, all records pertaining to the case will 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.

### **2.7.4 Secure Filing**

Concerns raised about pupils are stored securely in MyConcern, the school's online safeguarding software. They are accessed by the safeguarding team and, in part, by other staff members on a need-to-know basis.

### **2.7.5 Information sharing and pupil transfers**

Staff members have a professional responsibility to share relevant information as necessary on a need-to-know basis, including with all external partners, to protect children. Social Services have a duty to inform the school if a child with a Child Protection Plan is transferring to Heritage School.

If a pupil at Heritage School with a Child Protection File transfers to another school or college, all relevant safeguarding records will be sent to the receiving school or college within five days, in accordance with KCSIE. We require a receipt from the receiving school to confirm that records have been received. This receipt will be included in the leaving child's MyConcern record before it is archived. The DSL will consider whether it would be appropriate to share information with the new school or college in advance of a child leaving Heritage.

## **2.8 Supervision**

Staff at Heritage working with children about whom we have safeguarding concerns will have the opportunity to discuss any causes for concern they may have. It is the responsibility of the DSL and the DDSL to ensure there are regular opportunities for teachers concerned to discuss their concerns.

## **2.9 Children Missing Education**

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. Any such concerns must be dealt with immediately in keeping with this policy. In addition, in keeping with our Attendance and Children Missing Education Policy, 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 Felicity Hough (Safeguarding Trustee)
Date	August 2023

Review date	August 2024
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 (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.

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 child-on-child 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 as this can be a criminal offence. Please see our Acceptable Use of Screens Policy for more information. Our policy forbids the use of smart phones during school hours and on school trips.

### **Additional Information on Specific Forms of Abuse**

Annex B of KCSIE contains important additional information about specific forms of abuse and safeguarding issues that used to be reiterated in this appendix. Teaching staff and TAs at Heritage School are expected to read Annex B annually and to sign to say they have done so. Staff should refer back to [KCISE 2023](#) (stored in the Heritage Google Drive next to this Safeguarding Policy) for further definitive information. The topics covered in Annex B of KCSIE 2023 are:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Children and the court system
- Children missing from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation
- The Prevent duty
- Channel
- Sexual violence and sexual harassment between children in schools and colleges
- Serious Violence
- So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)
- FGM
- FGM mandatory reporting duty for teachers
- Forced marriage