

## Safeguarding Group Policies

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Policy drawn up by:	Trudy Read, Education Consultant
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## Safeguarding and Child Protection Policy

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## **Aims and Introduction**

Keeping children safe in education is our first priority and duty at West Lodge Independent School. We recognise and practise our legal and moral duty to promote the well-being of students and protect them from harm and are fully committed to ensuring we deliver excellence for and to every young person in our care.

## Part 1

### Key Staff:

Role:	Name and Contact details:
Designated Safeguarding Lead	Nicki Jennings <a href="mailto:nicki.jennings@libertylodge.com">nicki.jennings@libertylodge.com</a> Mobile No.: 07903836209
Deputy Designated Safeguarding Lead	None
PREVENT Lead	, Head Teacher
Head Teacher	Nicki Jennings <a href="mailto:nicki.jennings@libertylodge.com">nicki.jennings@libertylodge.com</a> Mobile No.: 07903836209
Governance/Proprietor	Ani Kukadia <a href="mailto:ani@libertylodge.com">ani@libertylodge.com</a>

### Safeguarding Procedures for Staff


- If a disclosure or concern is raised, all staff must follow the published procedure
- **Record keeping:** Each pupil will have their own file in which all documents relating to safeguarding or child protection will be stored. Access to these files will be restricted to the safeguarding team.
- Attendance to any 'safeguarding' meetings (including Family Network (FNw), Child in Need (CiN), and Child Protection (CP)) will be by, or directed by, the DSL.
- Each pupil's Risk Assessment will be the main information serving document for school staff. These are drawn up by or under the direction of the Head Teacher.
- School staff are responsible for requesting access to DSL actions at any time, in order they can trigger the Whistleblowing Policy as they deem necessary.
- All staff must strictly adhere to attendance procedures as part of their safeguarding responsibilities.
- **Safeguarding Training:** All staff are responsible for ensuring they comply with, and are engaged in, the mandatory training requirements published by West Lodge Independent School.

**What to do if I am worried that a child or young person is in immediate danger?**

**If a child is in immediate danger or is at risk of harm call the Police on 999**



**Always attempt to contact and liaise with the DSL or the DDSL.  
However, if you cannot, or to spend time doing so would put a child in danger, you should call the  
police or MASH team directly on  
0808 800 4005**



**After this contact, inform the DSL and write up all details of the disclosure/concern (names, times,  
dates etc) and your actions on the school's 'Record of Concern' form.  
Pass this written record to the DSL**

## Safeguarding Flow Chart 2

### What to do if I am worried about a child or young person?

If a child or young person asks to talk with you or begins to disclose information that you are concerned by, listen to them, reassure but do not promise confidentiality. Be honest in informing the child or young person that you may need to pass this information on

#### Recording:

As soon as is possible, write down all details on the school's 'Record of Concern Form'. Include the child's actual words wherever possible, times, dates and names. Do not include your point of view but simply a clear and factual record of what you have been told or what you have observed and are worried about. Sign the record, date and time it. If there are marks on the child/young person's body, record these on the body map included in the 'Record of Concern' form.

Pass the 'Record of Concern' form to the school's DSL who will then decide upon next steps.

#### Informing Carers/Support Workers/Social Workers:

- The DSL will inform Social Workers and Care Home Staff of all concerns and referrals unless this may cause harm to the child or place the child in danger

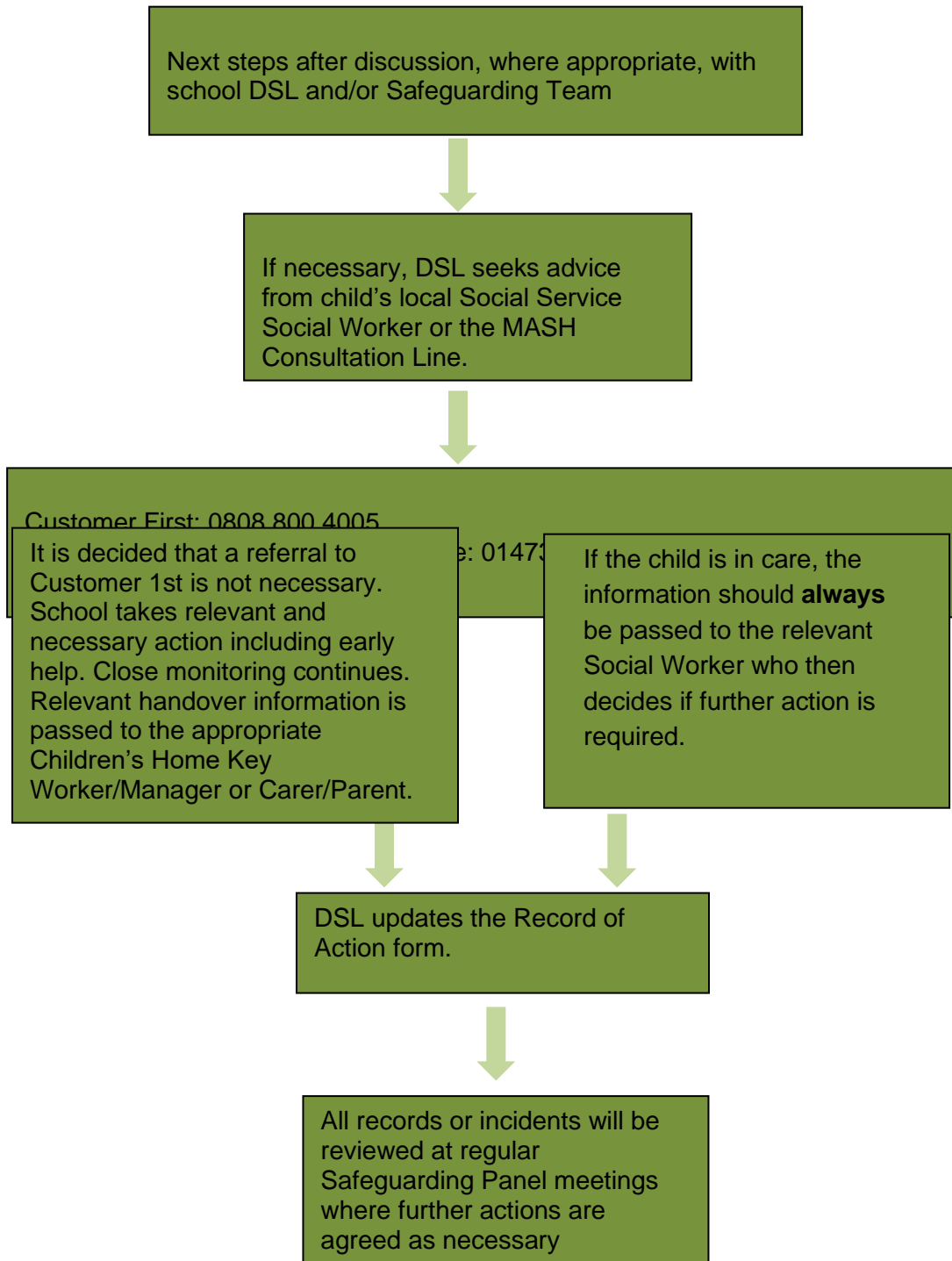
#### Reflection:

- In your role, have you done all you can?
- Refer any remaining concerns to the DSL
- Dealing with disclosures can be difficult and upsetting. Seek support for yourself and be aware of the principles of confidentiality

#### Note:

If a child or young person's disclosure or your observation needs a prompt response, and you are pupil facing, call for staff to cover your lesson so that you can step out and complete a Record of Concern form and pass on to DSL or as DSL, respond accordingly.

### Safeguarding Flow Chart 3: DSL's next steps



## PART 2

### Introduction

This policy has been developed in line with the principles established by the Children Act 1989 and in accordance with the following guidance:

- “Keeping Children Safe in Education” September 2019 and subsequent updates
- “Working Together to Safeguard Children” 2018
- Framework for the Assessment of Children in Need and their Families” 2000
- “What to do if you are worried a Child is being Abused” 2015
- Suffolk Local Safeguarding Children Board guidelines and the 3 safeguarding partners
- Information on School’s Advice
- Inspecting Safeguarding
- GDPR

West Lodge Independent School takes seriously its responsibility under section 11 of the Children Act and duties under “working together” to safeguard and promote the welfare of children; to work together with other agencies to ensure adequate arrangements exist within our setting to identify, and support those children who are suffering harm or are likely to suffer harm.

We recognise that all staff and the proprietor have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern.

We should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of every child or young person free from discrimination or bullying where each one can learn and develop happily.

This policy applies to all staff, the Proprietor and volunteers working in our school.

This policy has been written in line with Keeping Children Safe in Education 2019. All staff will be expected to sign to confirm they have read and understood this policy.

### Terminology

**Safeguarding and promoting the welfare of children** is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

Working Together to Safeguard Children (2018)

**Child protection** is:

- Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Working Together to Safeguard Children (2018)

**Early Help** is:

- providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years.

Keeping Children Safe in Education (2019)



**Staff**

- refers to all those working for or on behalf of West Lodge Independent School, full time or part time, in either a paid or voluntary capacity.

**A Child is:**

- Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

Working Together to Safeguard Children (2018)

**Parent:**

- refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**DSL:** Designated Safeguarding Lead

**DDSL:** Deputy Designated Safeguarding Lead

**The role of school staff**

Our staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All our staff have a responsibility to provide a safe environment in which children can learn.

- Our school has a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- The DSL (and any deputy) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- Although the children who come to our school are mostly in care, our staff will be equipped to identify children who may benefit from early help. Staff know in the first instance to discuss their concerns with the designated safeguarding lead, and understand they may be required to support other agencies and professionals in assessments for early help.
- Any member of staff who has a concern about a child's welfare should follow the referral processes (detailed on pages 6 and 21). Following any referral, and under the guidance of the DSL, staff should expect to co-ordinate and collaborate with Social Workers and other agencies.
- The Teachers' standards of 2012 state that teachers, including Head Teachers, should safeguard children's wellbeing and maintain public interest in the teaching professions as part of their professional duties.

### **What school staff need to know:**

- Every member of staff is aware of the systems in our school which support safeguarding. These are explained to them as part of their induction and include:
  1. This safeguarding and child protection policy
  2. The school's staff code of conduct
  3. The role of the DSL (including the identity of the DSL and any deputies)
  4. Keeping Children Safe in Education Part 1
  5. The school's Whistleblowing Policy
  6. Managing allegations about staff or volunteers
  7. The safeguarding response to children who go missing from education
  8. What to do if they have a concern about a child
- All staff receive appropriate safeguarding and child protection training which is updated at least every 3 years. In addition to this training all staff members receive safeguarding and child protection updates via the DSL, when required but at least annually, to provide them with relevant skills and knowledge to be able to safeguard the children in our setting effectively.
- All staff are made aware of the early help process, and understand their role in this. This includes staff being able to identify emerging problems, liaising with our designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, where appropriate, acting as the lead professional in undertaking any early help assessment. Our Early Help Offer is shared with staff, parents, carers, Social Workers and Children's Home Support Workers/Managers (see Appendix C).
- All staff are aware of the process for making child protection referrals to children's social care and statutory assessments that may follow, under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that might be expected to play in such assessments.
- All staff know what to do if a child tells them he/she is being abused or neglected. Staff understand how to maintain an appropriate level of confidentiality. They understand that this means only to involve those who need to be involved such as the DSL (or a deputy) and children's social care.
- Staff will never promise a child that they will not tell anyone about the allegation/disclosure that the child has made, as this may ultimately not be in the best interests of the child.

### **What school staff should look out for:**

Any child may benefit from early help, but our staff are particularly alert to the potential need for early help for a child who:

- Is a young carer;
- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance which presents challenge for the child, such as substance abuse, adult mental health problems or domestic abuse;

- Is in a family circumstance which presents challenge for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child;
- Is a child in care (CiC) or previously in care or looked after (LAC).

All school staff members are aware of the signs of abuse and neglect so they are able to identify children who may be in need of help or protection (see part 2 of this policy for the definitions).

- Departmental advice: What to do if you are worried a child is being abused- Advice for practitioners provides more information on understanding and identifying abuse and neglect.  
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- Staff in our school are advised to maintain an attitude at all times that, where safeguarding is concerned, “it could happen here”. When concerned about the welfare of a child, members of staff should always act in the best interests of the child.
- Knowing what to look for is vital to the early identification of abuse and neglect. If a member of staff is unsure they should always speak to the DSL (or DDSL).

### **What school staff should do if they have concerns about a child:**

If our staff have any concerns about a child’s welfare, they should act on them immediately. See page 5 for a flow chart setting out the process for our staff when they have concerns about a child.

Options will then include:

- Managing any support for the child internally via the school’s own pastoral support processes;
- An early help assessment;
- If the child is not already a Child in Care, a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.
- If the child is already a Child in Care, a referral to the Social Worker

The DSL should always be available to discuss safeguarding concerns. If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the School’s Leadership Team, the Proprietor and/or take advice from local children’s social care or the MASH Consultation line. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

Our staff should not assume a colleague or another professional will take action and share information that might be critical in keeping a child safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

## **Early Help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

## **Statutory Assessments**

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

## **Female Genital Mutilation: mandatory reporting duty for teachers**

Whilst our staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

## **Record keeping**

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on the school's 'Record of concern' form. If there are any doubts about recording requirements, staff should discuss with the DSL.

## **Why is all of this important?**

It is important for children to receive the right help at the right time to address risks and prevent issues from escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of this poor practice include:

- Failing to act on and refer the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the view of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information
- Sharing information too slowly and
- A lack of challenge to those who appear not to be taking action

## **What school staff should do if a child is in danger or at risk of harm?**

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, that a referral has been made.

## **What should school staff do if they have concerns about another staff member who may pose a risk of harm to children?**

This should be referred to the Head Teacher.

Where there are concerns/allegations about the Head Teacher, this should be referred to the Proprietor.

## **What should school staff do if they have concerns about safeguarding practices in the school?- whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

- All our staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and that such concerns will be taken seriously by leadership.
- All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues and appropriate advice will be sought from the LADO or Safeguarding Team where necessary.
- See full details in our whistleblowing policy.
- Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
- General guidance can be found at: <https://www.isi.net/parents-and-pupils/concerns-about-a-school>
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by the school. <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/> Staff can also call: 0800 028 0285 – this line is available from 8:00 AM to 8:00 PM, Monday to Friday. Alternatively, contact via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **Roles and responsibilities**

All schools must nominate a senior member of staff to coordinate child protection arrangements and this person is named in this policy guidance. The school ensures that the DSL will be available at all times that the school is open to discuss safeguarding concerns. Our school will also ensure that there are adequate and appropriate measures in place to cover out of hours/out of term activities.

## **Governance**

The Proprietor or an appropriately skilled representative of the Proprietor, undertakes the regular review of safeguarding related policies and procedures that operate within our school.

The Proprietor has a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements.

The Proprietor ensures there is:

- A DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken Suffolk Local Safeguarding Board (Suffolk LSCB) training in inter-agency training and in addition to basic child protection training.
- Safeguarding and Child protection policy and procedures that are consistent with Suffolk SCB
- Requirements are reviewed annually and made available to parents, carers and Social Workers on request.
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head Teacher.
- Safer recruitment procedures that include the requirement for appropriate checks in line with national guidance.

- A training strategy that ensures all staff, including the Head Teacher, receive child protection training, with refresher training at three-yearly intervals. The DSL and Deputy DSLs should receive refresher training at two-yearly intervals. The Deputy DSLs will be trained to the same level as the DSL, as required by Suffolk SCB.
- Regular update sessions for staff regarding safeguarding. Keeping staff up to date with any changes and ensuring that safeguarding remains a priority within the setting.
- Arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding and child protection.
- The Proprietor will nominate an appropriately positioned and qualified member of the company to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head Teacher.

#### **The Head Teacher:**

- Will be the DSL
- Ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff.
- Allocates sufficient time and resources to carry out their role effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures.
- Ensures that child's safety and welfare is addressed through the curriculum.

#### **The DSL:**

- Will attend DSL Safeguarding training every two years and keep up to date with change.
- Acts as a source of support and expertise to the school community.
- Has an understanding of Suffolk LSCB procedures.
- Notifies children's social care if a child with a child protection plan is absent for more than two days without explanation.
- Ensures that when a child leaves the school, their safeguarding information is passed to their new school and if the child has a social worker then they are informed.
- Attends and/or contributes to child protection conferences in accordance with local procedure and guidance.
- Coordinates the school's contribution to child protection plans.
- Develops effective links with relevant statutory and voluntary agencies.
- Ensures that all staff sign to indicate that they have read and understood this policy.
- Ensures that this safeguarding and child protection policy is updated annually.
- Liaises with the Proprietor or nominated representative of the Proprietor.
- Keeps a record of staff attendance at safeguarding and child protection training.
- Provides an annual safeguarding report to the Proprietor.
- Makes this policy available to parents, carers, Social Workers and Children's Home Support Workers/Managers via the school's website and as a hard copy on request.

#### **The DSL and Record Keeping**

##### **The DSL will:**

- Keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and confidentially but kept separately from the child's general file.
- Sends records to the relevant people, in particular, to the DSL at the pupil's main school for dual registered pupils.
- The records will be a coherent factual record of the concerns that are stored on individual children in a clear chronological order.
- Follow Suffolk's LSCB guidance on record keeping.

## **A Deputy DSL:**

- Is appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, a Deputy DSL will assume the role of the DSL, as shown above.

## **All staff will:**

- Follow the Suffolk Safeguarding Children Board Procedures/Local Authority guidance in all cases of abuse, or suspected abuse found at: <https://www.suffolkscb.org.uk/assets/Working-with-Children/How-to-Make-a-Referral/Safeguarding-Referral-Guidance.pdf> and overall information and guidance at: <https://www.suffolkscb.org.uk/>
- Implement and follow part 1 and 2 of this guidance.
- Understand that our responsibility to safeguard children requires that we all appropriately share any concerns that we may have about children.
- Support the child's development in ways that will foster security, confidence and resilience.
- Provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties. Provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children where appropriate.
- Ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral. This will be done using our paper based system.

## **Training**

- All staff/volunteers are expected to read at least Part 1 and Annex A of KCSIE 2019 and sign to say they have read and understood.
- Level 1 Safeguard training is offered to new staff on the first day of new position by the DSL.
- Level 2 Safeguard training is offered to new staff at regular intervals throughout the academic year.
- Level 2 safeguard training is offered every 2 years to all staff.
- Prevent training is offered to new staff at regular intervals throughout the academic year.
- Regular safeguard updates take place through PD days, teaching and learning meetings, and safeguard weekly meeting between the school's DSL/DDSL.
- New staff are directed and asked to complete home office online training for FGM and Channel.

## **Visitors**

Visitors are directed to the safeguarding information when they arrive at the school and are made aware of the safeguard team on site. There are Posters and leaflets around the school building offering advice and contact numbers for Customer First and whistleblowing numbers.

## **Supporting Children**

We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will support all children and young people by:

- Encouraging the development of self-esteem and resilience in every aspect of life.
- Promoting a caring, safe and positive environment.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.

- Contacting Social Care and/or the child's nominated Social Worker as soon as there is a significant concern.
- Contacting Social Care if a child/young person attending the school is privately fostered.
- Providing continuing support to a pupil (about whom there have been concerns) who leaves the school by ensuring that those concerns and all relevant records are forwarded under confidential cover to the DSL at the pupil's new school.

### **Confidentiality**

- We recognise that all matters relating to child protection are confidential.
- The DSL or Deputy DSLs will disclose personal information about a child or young person to other members of staff on a need to know basis only.
- However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.
- We will always undertake to share our intention to refer a child to Social Care with their parents and/or carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with MASH Professionals' Consultation Line or Social Care on this point.
- We will take no names consultations with our local MASH team to discuss concerns we may have, but we understand that if they then ask for a name we will disclose those details and it will become a referral.

### **Supporting Staff**

- We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support. This could be provided by another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate.
- We have adopted a code of conduct for staff who work at West Lodge Independent School. This forms part of staff induction. We understand that staff should have access to advice on the boundaries of appropriate behaviour.
- We recognise that our DSL and any Deputy DSL should have access to support and appropriate workshops, courses or meetings to support them in their role.

### **Safer Recruitment**

- Safer recruitment procedures are in line with the current legislation, Keeping Children Safe in Education 2019 part three. This is where further detail can be found.
- An enhanced DBS certificate, which includes barred list information, is required for any staff and volunteers who will be engaging in regulated activity (working unsupervised with children).
- For all other staff and volunteers who have opportunity for regular contact with children, but who are not engaging in regulated activity, an enhanced DBS check, which does not include a barred list check, will be appropriate.
- There are additional requirements for Governors and proprietors – see page 45 of KCSIE and refer to accordingly. They are required to have an enhanced criminal records certificate from the DBS including a section 128 check to check that they have not been prohibited from teaching.
- In addition, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.
- A single central record is kept by the school and meets the requirements as set out in chapter 3 of 'Keeping Children Safe in Education' 2019.



We will follow guidance on Disqualification by Association for staff who come into regular and frequent contact with children of reception age.

### **Allegations against staff**

- All staff must take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Head Teacher or the most senior member of staff available.
- The Head Teacher on all such occasions will discuss the content of the allegation with the Designated Officer for the Local Authority (LADO), before taking any action. In our county contact should be made with:
  - Rennie Everett  
LADO team – 0300 123 2044  
[LADO@suffolk.gov.uk](mailto:LADO@suffolk.gov.uk)
- If the allegation made to a member of staff concerns the Head Teacher themselves, the person receiving the allegation will immediately inform the Proprietor who will consult with the LADO, without informing the Head Teacher.
- If the allegation made to a member of staff concerns the Proprietor, the person receiving the allegation will contact and consult with the LADO immediately, without notifying the Proprietor.
- The school will follow the procedures for managing allegations against staff, as outlined in 'Keeping Children Safe in Education' 2019.
- Suspension of the member of staff against whom an allegation has been made, needs careful consideration. We will consult with the LADO and our HR Team before making any decisions around suspension.

### **Physical Intervention/Positive Handling**

- The need to use physical intervention with pupils is unlikely but could be necessary in extreme circumstances.
- We recognise that members of school staff have a legal power to use reasonable force to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder (Use of reasonable force, Advice for Head Teachers, Staff and Governing Bodies, DfE July 2013).
- When using reasonable force in response to risk presented by incidents involving children with SEN or disabilities or with medical conditions, we will consider the risks carefully and recognise the additional vulnerability of children in these groups. We will also consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.
- Wherever possible we will work with social care, medical and education colleagues to plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents, carers, Social Workers and Children's Homes' Managers schools. By doing this we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. For more information see our 'Promoting Positive Behaviour' policy.
- Such events should be recorded and signed by a witness.
- We understand that physical intervention of a nature which is both unreasonable and disproportionate to the circumstances and or causes injury or distress to a child may be considered under child protection or disciplinary procedures.

## **Anti-Bullying**

- Our policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Bullying is a safeguarding matter that if left unresolved can become a child protection matter. Our setting will take seriously any bullying concerns and both investigate and take action to protect pupils where appropriate.
- As members of the Anti-Bullying Alliance, we seek advice from and consult with the organisation to ensure best practice: <https://www.anti-bullyingalliance.org.uk/aba-our-work> In addition, we subscribe to their online training modules which are completed by all staff as part of their cpd programme.
- We will liaise with the anti-bullying co-ordinator from SCC where appropriate (<https://www.suffolk.gov.uk/children-families-and-learning/schools/pupil-attendance-and-welfare/bullying-at-school>)
- See full details in our Anti-Bullying Policy.

## **Health & Safety**

- Our Health & Safety policy, reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits.
- See full details in our Health and Safety Policy.

## **Children with Special Educational Needs**

In our school we know that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

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

## **Children Missing Education**

We understand the safeguarding implications of pupils not attending school without explanation and will work closely with Social Workers, Managers of and Support Workers in Children's Homes as well as Local Authorities' Attendance Teams and EWO to enable them to fulfil their duties around children missing education.

In our school:

- We provide individual timetables for the following week's planned sessions
- We scrutinise attendance carefully and take immediate safeguarding action where concerns arise.

West Lodge Independent School is committed to working with the Suffolk Children Missing Education Team to improve outcomes for pupils in the county that are not receiving a suitable full-time education.

## **Sighting Pupils**

- In our school, we work with some students who have experience of significant trauma, are often in the care of the local authority and for whom school is a significant challenge.
- If a pupil does not attend school and we have not already been informed of the reason by the Children's Home or the child's Social Worker, this will be regarded as a safeguarding concern and be reported as such and in line with processes outlined in this policy.
- We will be clear with parents, carers, social workers and managers of residential children's homes that this is part of our role in carrying out our safeguarding duties.
- Repeated failed attempts to sight the student will result in a request for the Social Worker or police to carry out a welfare check.
- Young people that are not in receipt of education for a period exceeding four weeks should be referred to the Children Missing Education Officer at Suffolk County Council Tel: 01473 265224

## **Absconding / Missing Persons**

- When a young person goes missing from a school site, or does not arrive at their specified location, if appropriate school staff will pursue. If this is not appropriate (in reference to child's risk assessment) parents, carers, Social Workers will be made aware so that they can complete initial searches prior to notifying the police themselves.
- The only time school staff would be expected to report the young person missing would be if there are safeguarding concerns around the individual or their carers. This report should be made by calling 101 or 999 whichever is most appropriate at the time.

## **Private fostering**

- Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.
- The school will notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

## **Children in Care and previously looked after children**

We recognise that children in care are particularly vulnerable - the most common reason for children becoming looked after is as a result of abuse and/or neglect.

The DSL will liaise with the Designated Teacher for Children in Care to ensure that staff have the information they need in relation to a child's legal status i.e. whether they are looked after:

- under voluntary arrangements with consent of parents or
- on an interim or full care order
- and contact arrangements with birth parents or those with parental responsibility.
- They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL will ensure details of the child's social worker and the name of the virtual school head in the authority that looks after the child are recorded on the school's information system.

Our staff understand that previously looked after children potentially remain vulnerable. This status will be highlighted to staff.

## Types of abuse and neglect

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Specific safeguarding issues**

- All staff have an awareness of safeguarding issues - some of which are listed below. Staff are made aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.
- All staff are made aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexual violence/sexual harassment, sexting (known as youth produced sexual imagery) and limitation/hazing type violence and rituals. Staff are clear about our policy and procedures with regards to peer on peer abuse.
- All staff are aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'upskirting'. The Crown Prosecution Service (CPS) defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. Such an act is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.
- We are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges 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.

### **Online safety**

- In our school, pupils work online and we recognise that it is crucial to safeguard our pupils from potentially harmful and inappropriate online material. As such we ensure appropriate filters and appropriate monitoring systems are in place. Please refer to the school's separate policy for Online Safety.

### **Opportunities to teach safeguarding**

- In our school we ensure our pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education (PSHE), and through relationship and sex education (RSE).
- Across the curriculum, pupils are introduced to, and encouraged to use a skills based approach to keeping themselves safe. These skills are introduced through PSHE lessons and include risk taking, recognition of healthy and unhealthy relationships and coercive behaviour. Students are then supported, within the safety of the school community, to develop their use of these skills in appropriate and effective ways.

### **Allegations of abuse made against other children (peer on peer abuse)**

- Our staff recognise that children are capable of abusing their peers. In a situation where child abuse is alleged to have been carried out by another child, our child protection procedures should be adhered to for both the victim and the alleged abuser; this means it should be considered as a child care and protection issue for both children.
- Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse this could for example include girls being sexually touched/assaulted or boys

being subject to initiation/hazing type violence. Annex A contains important additional information about specific forms of abuse and safeguarding issues.

## Dealing with Disclosures

If a pupil asks to speak to you about a problem do not promise confidentiality but explain that it may be necessary to consult a colleague.

### Receive

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.

Listen quietly and actively, giving your undivided attention.

Allow silences when needed.

Do not show shock or disbelief but take what is said seriously.

### Reassure

Stay calm.

Make no judgements.

Empathise.

Never make a promise that you can keep what a child has said a secret. Give reassurance that only those who need to know will be told. Reassure the young person that they were right to tell you.

### Respond

Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter but don't interrogate for full details.

Don't ask leading questions – keep the open questions e.g. 'is there anything else you want to say?' If you need to try to get more details again keep to open questions, "tell me a bit more about that"

If you do ask questions remember to record the questions you ask as well as the responses the young person gives.

Do not criticise the perpetrator; the student may have affection for him/her. Explain what you will do next – inform designated teacher, keep in contact.

### Record

If possible, make notes as you listen or as soon as possible after the disclosure, record what you have been told or observe.

Record what was actually said by the pupil rather than your interpretation of what they are telling you, be factual at all times.

Record the date, time, place and any noticeable nonverbal behaviour.

Record the information as a safeguarding concern on the school's Record of Concern form.

### Report

Report the incident to the DSL and do not tell any other adults or pupils what you have been told.

Never attempt to carry out an investigation of suspected abuse by interviewing the pupil or any others involved.

This is a highly skilled role and any attempts by you to do so could affect any criminal proceedings.

## APPENDIX A – SPECIFIC FORMS OF ABUSE AND SAFEGUARDING ISSUES

Issues covered:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Modern Day Slavery
- Preventing radicalization
- Peer on peer abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Additional advice and support

All sections are taken from Keeping Children Safe in Education 2019 apart from 'Modern Day Slavery'.

### Child drug and criminal exploitation

'County Lines' is a national issue which involves the exploitation of vulnerable young people and adults by violent gang members in order to move and sell drugs across the country. The gangs recruit vulnerable people, often children, to act as couriers and to sell drugs. Exposure to gang exploitation has the potential to generate emotional and physical harm. Typical county lines methodology involves gangs exploiting children to deliver drugs from the urban to county location using intimidation, violence, debt bondage and grooming. Whilst male children are most commonly exploited, almost half of areas report the use of female children. Children aged 12-18 are being exploited, with 15-16 years being the most common age of involvement for under 18s. Although child sexual exploitation (CSE) is not the driving factor in county line gangs exploiting children, a clear link between county lines exploitation and child sexual exploitation exists.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation.

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.



## **Children and the court system**

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

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

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Children missing from education (CME)**

After closure of the school register at West Lodge Independent School, if no contact has been received from parent(s), carer, or Children's Home staff to explain reason for absence, the school will attempt to make contact using all available numbers. If these attempts are unsuccessful, the child's Social Worker will be contacted and an unannounced home visit will be requested. If pupil/family are an open case and known to early help/social care/ police, the DSL/DDSL will contact the appropriate Lead Professional. The DSL/DDSL will contact the Children Missing Education team on 01473 265225. If appropriate the DSL/DDSL will complete a multi-agency referral form (MARF) to social care and, in line with the Suffolk county council CME policy will complete form 1 children missing education and send to ehe@suffolk.gov.uk and email a copy of the de-registration letter to both EHE and CME teams.

## **Child sexual exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including

gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **Key Facts about CSE**

Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.

It affects both girls and boys and can happen in all communities.

- Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with Disabilities.
- Victims of CSE may also be trafficked (locally, nationally and internationally).
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

### **Good practice – Individuals**

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective/behaviour of the child/young person and be patient with them
- Help the child/young person to recognise that they are being exploited
- Collate as much information as possible
- Share information with other agencies and seek advice/refer to Social Care

### **Good practice – Organisations**

- Ensure robust safeguarding policies and procedures are in place which cover CSE
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

### **Domestic abuse**

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse signs symptoms effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation: [here](#).

### **Cultural Issues**

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

#### **Actions**

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local

safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **Modern Day Slavery (MDS)**

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

The Home Office estimates there are 13,000 victims and survivors of modern slavery in the UK; 55% of these are female and 35% of all victims are trafficked for sexual exploitation.

Poverty, war and limited opportunities at home are some of the key drivers which can make someone vulnerable to being trafficked and exploited. Victims of slavery can be men, women or children of all ages.

There are several different types of modern slavery, which in the UK, are prohibited under the 2015 Modern Slavery Act. It can include children and adults forced to work in agriculture, domestic work, factories and sweatshops, or girls forced to marry older men.

Someone is in slavery if they are:

- forced to work through mental or physical threat
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as 'property'
- physically constrained or have restrictions placed on his/her freedom

Sources: <https://www.england.nhs.uk/ourwork/safeguarding/our-work/modern-slavery/>  
<http://www.escb.co.uk/en-gb/safeguardingtopics/traffickingandmodernslavery.aspx>

### **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. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should

follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **Prevent**

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

### **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the CounterTerrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the Revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

## **Additional support**

The department has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

## **Channel**

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance, and a Channel awareness e-learning programme is available for staff at: Channel General Awareness.

The school or college's Designated Safeguarding Lead (and any deputy) should be aware of local procedures for making a Channel referral. As a Channel partner, the school may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

## **Peer on peer abuse**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

The gendered nature of peer on peer abuse means that girls are more likely to be victims and boys the perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously.

Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

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

### **Context**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- making clear the act of ‘upskirting’ is a criminal offence. The Crown Prosecution Service (CPS) defines ‘upskirting’ as a colloquial term referring to the act of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

## **What is Sexual violence and sexual harassment?**

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### **Sexual harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 23 in Part 1 of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL (or a deputy)

### **Sexting in schools**

Sexting is a term used to describe ‘youth produced sexual imagery’ and commonly takes the form of photos and messages shared on social media or via text messages. It includes young people sharing images that they, or another young person, have created of themselves. It covers both still photos and moving videos.

We will consult with Social Workers and Managers of Children’s Homes and follow the guidance for schools on how to respond to incidents of sexting, which is given here:

- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)
- [www.suffolkscb.org.uk](http://www.suffolkscb.org.uk)



## Appendix B: Further Information and useful links

Safeguarding issue	Link to or title of advice and guidance	Source
Abuse	<a href="https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2">https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2</a> <a href="https://www.gov.uk/guidance/domestic-abuse-how-to-get-help">https://www.gov.uk/guidance/domestic-abuse-how-to-get-help</a> <a href="https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief">https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief</a> <a href="https://www.disrespectnobody.co.uk/">https://www.disrespectnobody.co.uk/</a>	.gov.uk .gov.uk .gov.uk
Bullying	Preventing bullying including cyberbullying <a href="https://www.anti-bullyingalliance.org.uk/">https://www.anti-bullyingalliance.org.uk/</a> <a href="https://learning.nspcc.org.uk/research-resources/schools/anti-bullying-resources/">https://learning.nspcc.org.uk/research-resources/schools/anti-bullying-resources/</a>	ABA NSPCC
Children and the courts	<a href="https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds</a> <a href="https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds</a>	.gov.uk .gov.uk
Children missing from home, care or education	<a href="https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care">https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care</a> <a href="https://www.gov.uk/government/publications/missing-children-and-adults-strategy">https://www.gov.uk/government/publications/missing-children-and-adults-strategy</a> Local procedures can be found on SSCB website at: <a href="https://www.suffolkscb.org.uk/">https://www.suffolkscb.org.uk/</a>	.gov.uk .gov.uk
Children with family in prison	<a href="https://www.nicco.org.uk/">https://www.nicco.org.uk/</a>	
Exploitation of children	February 2020 updated guidance: <a href="https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines">https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines</a> CSE guidance: <a href="https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners">https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners</a> <a href="https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit">https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit</a> <a href="https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gang-criminal-exploitation/">https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gang-criminal-exploitation/</a>	.gov.uk DfE .gov.uk NSPCC

Safeguarding issue	Link to or title of advice and guidance	Source
Drugs	<p>Drugs Advice for schools:  <a href="https://www.gov.uk/government/publications/drugs-advice-for-schools">https://www.gov.uk/government/publications/drugs-advice-for-schools</a></p> <p>Drugs Strategy 2017:  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628148/Drug_strategy_2017.PDF">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628148/Drug_strategy_2017.PDF</a></p> <p>Advice:  <a href="https://www.talktofrank.com/get-help/worried-about-a-child">https://www.talktofrank.com/get-help/worried-about-a-child</a></p>	<p>DfE and HCPO</p> <p>.gov.uk</p> <p>Website: Ask Frank</p>
Health and Wellbeing	<p>Health and Wellbeing</p> <p><a href="https://www.childrensociety.org.uk/back-to-school/childrens-well-being-and-mental-health">https://www.childrensociety.org.uk/back-to-school/childrens-well-being-and-mental-health</a></p> <p><a href="https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/articles/measuringnationalwellbeing/march2018">https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/articles/measuringnationalwellbeing/march2018</a></p> <p><a href="https://www.ncb.org.uk/what-we-do/together-we-deliver-better-childhood/transforming-mental-health-wellbeing/partnership-0">https://www.ncb.org.uk/what-we-do/together-we-deliver-better-childhood/transforming-mental-health-wellbeing/partnership-0</a></p>	<p>The Children's Society</p> <p>Office for National Statistics (ONS)</p> <p>National Children's Bureau (NCB)</p>
Violence	<p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf</a></p> <p>Sexual violence and harassment between children:</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf</a></p>	<p>Home Office</p> <p>.gov.uk/DfE</p>
Radicalisation	<p><a href="https://learning.nspcc.org.uk/safeguarding-child-protection/radicalisation/">https://learning.nspcc.org.uk/safeguarding-child-protection/radicalisation/</a></p> <p>Prevent Duty April 2019 update:  <a href="https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales">https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales</a></p>	<p>NSPCC DfE guidance</p> <p>.gov.uk</p>
Self-Harm	<p>NSPCC guidance:  <a href="https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/self-harm/">https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/self-harm/</a></p> <p>Suffolk Safeguarding Children Board:  <a href="https://www.suffolkscb.org.uk/safeguarding-topics/self-harm/">https://www.suffolkscb.org.uk/safeguarding-topics/self-harm/</a></p>	<p>NSPCC</p> <p>SSCB</p>

## Appendix C: West Lodge Independent School's Early Help offer

Although the majority of pupils who attend West Lodge Independence School are in the care of a Local Authority and in residential children's homes, West Lodge Independent School believes in providing universal support for all its pupils and their care network as well as contributing fully to every pupil's entitlement as a child in care.

West Lodge Independent School's Early Help offer	
Source	Information
Suffolk Safeguarding Children Board	Website containing the most up to date local information regarding the safeguarding of children in Suffolk. <a href="https://www.suffolkscb.org.uk">https://www.suffolkscb.org.uk</a>
Universal support from LLIS	All staff at LLIS deliver pastoral support to pupils in its care and are available to Parents, Carers, Managers and staff of Residential Children's Homes and Social Workers. Where staff are unable to answer a question, they will signpost.  School Contact: 01473 233350
Emotional wellbeing: Helping pupils access the help they need outside of school or home	There are times when a young person may not feel able to confide in a Carer, Parent, Teacher or Social or Support Worker.  Further options include:  <b>Childline:</b> Call, 1-2-1 Counsellor Chat or Email <a href="https://www.childline.org.uk/get-support/contacting-childline/">https://www.childline.org.uk/get-support/contacting-childline/</a>  <a href="https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/">https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/</a>  <a href="https://www.childline.org.uk/locker/inbox/">https://www.childline.org.uk/locker/inbox/</a>  <b>Papyrus:</b> national charity dedicated to the prevention of young suicide <a href="https://papyrus-uk.org/">https://papyrus-uk.org/</a>  Hopeline: tel:0800 068 41 41  Text: 07860 039967  Email: pat@papyrus-uk.org
Online safety	Child Exploitation and Online Protection command: <a href="http://www.ceop.police.uk">www.ceop.police.uk</a>  <b>Think U Know: education programme from NCA/CEOP:</b> <a href="https://www.thinkuknow.co.uk/">https://www.thinkuknow.co.uk/</a>  UK Safer Internet Centre: <a href="https://www.saferinternet.org.uk/advice-centre/young-people">https://www.saferinternet.org.uk/advice-centre/young-people</a>  Childnet: <a href="https://www.childnet.com/">https://www.childnet.com/</a>
Personal Development Curriculum	This includes Personal, Social Health Education (PSHE), Sex and relationships Education (SRE), Spiritual, Moral and Cultural Education (SMSC), British Values (BV) and Careers Education, Advice and Guidance and includes many areas of keeping young people safe, healthy, self-aware as well as of the world around them and, over time, increasingly resilient and able to make informed decisions.

Developing:

- Responsible, respectful and active citizens who are able to play their part and become actively involved in public life as adults.
- Pupils' understanding of the fundamental British values of democracy, individual liberty, the rule of law and mutual respect and tolerance.
- Pupils' character, which Ofsted defines as a set of positive personal traits, dispositions and virtues that informs their motivation and guides their conduct so that they reflect wisely, learn eagerly, behave with integrity and cooperate consistently well with others.
- Pupils' confidence, resilience and knowledge so that they can keep themselves mentally healthy.
- Pupils' understanding of how to keep physically healthy, eat healthily and maintain an active lifestyle, including giving ample opportunities for pupils to be active during the school day and through extra-curricular activities.
- Pupils' age-appropriate understanding of healthy relationships through appropriate relationships and sex education.

Promoting:

- Equality of opportunity so that all pupils can thrive together, understanding that difference is a positive, not a negative, and that individual characteristics make people unique.

An inclusive environment that meets the needs of all pupils, irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.

Enabling/Supporting:

- Pupils to recognise online and offline risks to their well-being – for example, risks from criminal and sexual exploitation, domestic abuse, female genital mutilation, forced marriage, substance misuse, gang activity, radicalisation and extremism – and making them aware of the support available to them.
- Pupils to recognise the dangers of inappropriate use of mobile technology and social media.
- Readiness for the next phase of education, training or employment so that pupils are equipped to make the transition successfully.

Providing:

- An effective careers programme in line with the government's statutory guidance on careers advice that offers pupils:
  - unbiased careers advice.
  - experience of work, and Contact with employers to

encourage pupils to aspire, make good choices and understand what they need to do to reach and succeed in the careers to which they aspire.

Spiritual development:

- Ability to be reflective about their own beliefs (religious or otherwise) and perspective on life.
- Knowledge of, and respect for, different people's faiths, feelings and values.

- Sense of enjoyment and fascination in learning about themselves, others and the world around them.
- Use of imagination and creativity in their learning.
- Willingness to reflect on their experiences.

Moral development:

- Ability to recognise the difference between right and wrong and to readily apply this understanding in their own lives, and to recognise legal boundaries and, in doing so, respect the civil and criminal law of England.
- Understanding of the consequences of their behaviour and actions.
- Interest in investigating and offering reasoned views about moral and ethical issues and ability to understand and appreciate the viewpoints of others on these issues.

Social development:

- Use of a range of social skills in different contexts, for example working and socialising with other pupils, including those from different religious, ethnic and socio-economic backgrounds.
- Willingness to participate in a variety of communities and social settings, including by volunteering, cooperating well with others and being able to resolve conflicts effectively.
- Acceptance of and engagement with the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. They will develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

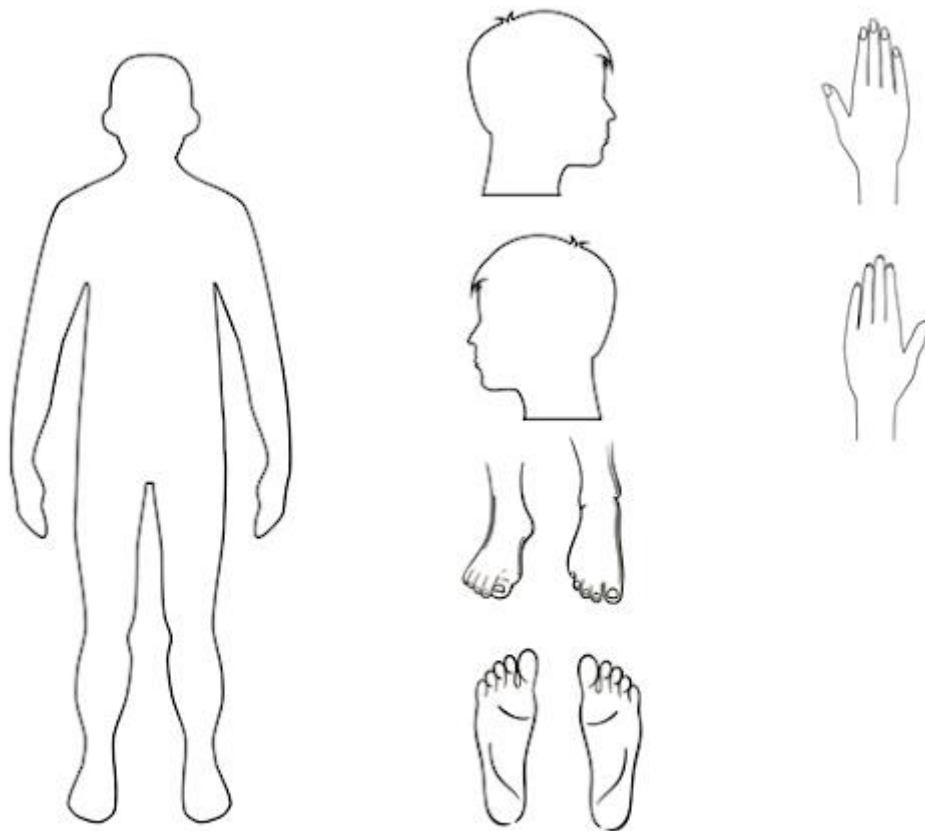
Cultural development:

- Understanding and appreciation of the wide range of cultural influences that have shaped their own heritage and that of others.
- Understanding and appreciation of the range of different cultures in the school and further afield as an essential element of their preparation for life in modern Britain.
- Ability to recognise, and value, the things we share in common across cultural, religious, ethnic and socio-economic communities.
- Knowledge of Britain's democratic parliamentary system and its central role in shaping our history and values, and in continuing to develop Britain.
- Willingness to participate in and respond positively to artistic, musical, sporting and cultural opportunities.
- Interest in exploring, improving understanding of and showing respect for different faiths and cultural diversity and the extent to which they understand, accept, respect and celebrate diversity. This is shown by their respect and attitudes towards different religious, ethnic and socio-economic groups in the local, national and global communities.

Appendix D: Record of Concern form  
Appendix E: Record of Action form

West Lodge Independent School Record of Concern form	
Staff name:	Role:
Date:	
Time of disclosure/concern/incident:	
Name of child:	DoB:
Time of this written record:	
<b>Below, record details of the disclosure, concern and/or incident. Record only factual information and, where possible and relevant, the young person's actual words.</b>	
<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
Signature of staff completing record on page 1:	

**Where injury is observed, circle and label on body map:**



**Record written account of the injury(ies) below and details of any first aid that is given:**

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**Signature of staff (including trained First Aider) completing this record on page 2:**

**Now, pass this Record of Concern form immediately to the school's DSL**





**Record category of safeguarding below. Tick all relevant boxes:**

- abuse     physical abuse     emotional abuse     sexual abuse     neglect
- peer on peer     criminal behaviour     drugs misuse     substance misuse     alcohol misuse
- radicalisation     sexting     sexual violence     sexual harassment     online safety
- child missing in education     knife crime     physical violence     child sexual exploitation
- female genital mutilation     'honour' based violence     other. Please state:

**Outcomes:**

Record all details below.

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**Signature of staff completing this record on page 2:**

**Safeguarding Panel meeting**

**Staff attending & roles:**

**Date and time of Panel meeting:**

**Outcomes of Panel meeting:**

Summarise below and tick status box:

Case open:

Case closed:

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**Signature of Panel Lead:**

## Staffing and Safer Recruitment Policy

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## 1/ Introduction

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. West Lodge Independent School (LLIS) is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, our school expects all staff and volunteers to share this commitment.

The school is committed to a thorough and consistent Safer Recruitment Policy as an integral part of its duty of care to all students.

## 2/ Policy aims:

- To help deter, reject or identify people who might abuse students or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.
- To ensure that LLIS provides a system which encourages openness and transparency in order to safeguard children, young people and staff. Our school encourages students, parents/carers, staff and Local Authority clients to raise any concerns with regard to any aspect of the service which could be improved upon.
- Deliver a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the school based on the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification.
- Conduct the recruitment and selection of staff in a professional, timely and responsive manner and in compliance with current employment legislation.
- Ensure that if a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they declare this as soon as they are aware of the individual's application. Thereafter, they will withdraw from any involvement in the recruitment and selection decision-making process.

The policy objectives are to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at West Lodge Independent School.

### 3/ Legislation and statutory responsibilities

This policy is written in line with the following and should be read alongside the school's Safeguarding and Child Protection Policy:

- DfE's statutory guidance, Part 3 of [Keeping Children Safe in Education \(2019\), updated April 2020](#)
- [Working Together to Safeguard Children \(2018\)](#)

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Parts 3 and 4 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Safeguarding Children and Safer Recruitment in Education Guidance DfES/04217/2006
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

### 4/ Roles and responsibilities

It is the responsibility of the Proprietor to:

- Ensure the school has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor the school's compliance with them.
- Ensure that all staff involved in recruitment have Safer Recruitment training

It is the responsibility of the Head Teacher and the Proprietor involved in recruitment to:

- Ensure that the school operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at West Lodge Independent School.
- To monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

In accordance with Staffing Regulations, the Proprietor has delegated responsibility to the Head Teacher to lead in all appointments.

## **5/ Recruitment and selection procedure**

### **5.1 Advertising**

To ensure equality of opportunity, LLIS will advertise all vacant posts to encourage as wide a field of applicant as possible, normally this entails an external advertisement.

The advert will consist of:

- Post title
- Hours
- Grade or scale
- Salary
- Permanent or fixed term
- The requirement for an enhanced DBS disclosure
- Advert text
- Closing date.

Any advertisement will make clear the school's commitment to safeguarding and promoting the welfare of children.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).

### **5.2 Application Forms**

The school uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history as well as

their suitability for the role. In addition, all applicants are required to account for any gaps or discrepancies in employment history.

The application form will include the applicant's declaration regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and possible referral to the police and other professional regulatory bodies.

### **5.3 Job Descriptions and Person Specifications**

A job description is a key document in the recruitment process and must be finalised prior to

taking any other steps. It will clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. All person specifications will include:

- Education/training
- Experience
- Knowledge
- Skills and abilities

The person specification will also include a specific reference to suitability to work with children and the requirement for all successful applicants to undergo an enhanced DBS disclosure.

### **5.4 References**

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted. In such cases, this reference will be taken up immediately after interview and prior to any formal offer of employment being made. Two professional/character references must be provided. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. Any

discrepancies or anomalies will be followed up. Direct contact by phone or face-to-face will be undertaken with each referee to verify the reference.

The school does not accept open references, testimonials or references from relatives.

## **5.5 Interviews**

There will be a face-to-face interview wherever possible, and the same panel will see all the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria in line with safer recruitment training delivered by the provider, Safecic.

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process. At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Only original documents will be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed following the end of the recruitment programme.

## **5.6 Offer of appointment and new employee process**

The appointment of all new employees is subject to the receipt of a satisfactory Enhanced DBS Certificate, references, medical checks, copies of qualification and proof of identity. A personal file checklist will be used to track and audit paperwork obtained in accordance with the Safecic Safer Recruitment Training. The checklist will be retained on personal files. The Human Resources Department will contact the Head Teacher to confirm that all paperwork has been received and a start date can be agreed.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

## **6/ Staff**

### **6.1 New staff**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

- Verify their mental and physical fitness to carry out their work responsibilities
  - Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
  - Verify their professional qualifications, as appropriate
  - Ensure they are not subject to a prohibition order if they are employed to be a teacher
  - Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
  - Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

### **6.2 Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **6.3 Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **6.4 Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **6.5 Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.



We will not keep copies of such checks for longer than 6 months.  
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.  
We will check the identity of all contractors and their staff on arrival at the school.

### **6.6 Trainee/student teachers**

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

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

### **6.7 Volunteers**

If we welcome volunteers on to our team, we will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **6.8 Staff working in alternative provision settings**

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

### **6.9/ Adults who supervise pupils on work experience**

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

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

### **6.10/ Peripatetic staff, consultants, agency staff and mentors**

The school will carry out or have evidence of the same standard of checks for all staff working in the school even if they are not employed directly by the school. It is the Head Teacher's responsibility to ensure that these checks are carried out. All outside providers will be requested to provide evidence in writing and in advance of the provider starting work at the school. This should be agreed as part of any contract between the company and provider. The company has the right to view the original copy of the Disclosure from the individual/agency if it contains additional information. Evidence of checks from external providers should be recorded on the Central Record.

The Head Teacher should only use agencies who demonstrate robust recruitment and selection procedures ensuring that their employees are DBS cleared, have had a full face-to-face interview and all the appropriate pre-employment checks in line with this policy.

As with any external provider coming onto the school premises staff should verify their identity, the provider will be asked to show documents such as a passport or driver's license along with a company ID.

Residential support workers from Liberty and/or Fern Lodge may, on occasion, be required to provide support within the school. For clarity, as the recruitment process of such staff has been carried out under Able Healthcare's Safer Recruitment Policy it is unnecessary to carry out additional checks. The Head Teacher must have sight of the result of these checks and then enter staff details on to the school's Single Central Record.

## **7/ Governance**

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

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

The proprietor will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

## **8/ The Rehabilitation of Offenders Act 1974**

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with or having access to students. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at West Lodge Independent School.

## **9/ DBS (Disclosure and Barring Service)**

All staff at the school require an enhanced DBS Certificate which must be obtained before the commencement of employment by any new employee.

It is the school's policy to re-check an employee's DBS Certificates every three years and in addition if any employee takes leave for more than three months (ie: maternity leave, career break etc.) they must be re-checked before they return to work.

Members of staff at the school are aware of their obligation to inform the Proprietor or the company's HR Department of any cautions or convictions that arise between these checks taking place.

### **9.1 Portability of DBS Certificates Checks**

The DBS code of Practice and OFSTED does not facilitate portability of DBS Certificate checks unless the applicant has registered to the DBS Update Service. For clarity, portability refers to the re-use of a DBS Certificate obtained for a position in one organisation and later used for another position in another organisation. LLIS is committed to adhering to

these Codes of Practice and does not accept DBS Certificates carried out by another organisation unless they are registered with the DBS Update Service.

### **10/ Dealing with convictions**

West Lodge Independent School operates a formal procedure if, for an employee, a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances;
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Human Resources Manager. A decision will be made following this meeting.

### **11/ Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status**

All applicants invited to attend an interview at the school will be required to bring their identification documentation such as passport, birth certificate, driving licence

etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification legally required for the position and claimed in their application form.

### **12/ Overseas checks**

All new employees where persons have lived outside the UK are subject to additional checks in accordance with Immigration, Asylum and Nationality Act 2006. The school, in accordance with the UK Border Agency Code of Practice, will sponsor all new foreign members of staff.

### **13/ Medical Fitness**

Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment offer is confirmed. All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required.

### **14/ Induction Programme**

All new employees will be given an induction programme which will clearly identify the school's policies and procedures, including the Safeguarding and Child Protection Policy, and make clear the expectation and codes of conduct which will govern how staff carry out their roles and responsibilities.

### **15/ Single Central Record (SCR)**

In addition to the various staff records kept in school and in individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the DfE requirements laid out in Chapter 3 of 'Keeping Children Safe in Education 2019'. This is kept up-to-date and retained by the Head Teacher.

The Centralised Register will contain details of the following:

- All employees who are employed to work at the school which includes verification of identity and qualifications
- All employees who are employed as supply staff to work at the school, whether employed directly or through an agency
- All others who have been chosen by West Lodge Independent School to work in regular contact with children. This will cover volunteers, peripatetic staff and people brought into the school to

provide additional teaching or instruction for students but who are not staff members eg: sports coaches etc.

#### **16/ Record Retention / Data Protection**

The school will retain all interview notes on all applicants for a period of 6 months, after which time the notes will be destroyed (i.e. shredded). The 6 month retention period is in accordance with the Data Protection Act 1998 and will also allow the school to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal.

All information retained on employees is kept in a locked and secure cupboard in the office of West Lodge Residential Care Home.

#### **17/ Ongoing Employment**

Our school recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. West Lodge Independent School will therefore provide ongoing training and support for all staff, as identified through the Annual Review/Appraisal policy.

#### **18/ Leaving Employment at West Lodge Independent School**

Despite the best efforts to recruit safely there will be occasions when allegations of abuse against children and young people are raised. In cases relating to the behaviour of an employee (these behaviours are within the context of four categories of abuse (i.e. physical, sexual and emotional and neglect) the school's Staff Disciplinary Policy will apply.

In cases of dismissal (or resignation) due to the above behaviour, LLIS will inform the Local Authority's LADO Team, the DfE and the Children's Safeguarding Unit regarding the circumstances around why the employee is leaving the school's employment.

## **19/ Monitoring and Review**

The Head Teacher will be responsible for ensuring that this policy is monitored and reviewed at least yearly.

**This policy should be read in conjunction with our:**

- Safeguarding and Child Protection Policy
- Annual Review/Appraisal Policy

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**Whistleblowing Policy**

## 1/ Aims

West Lodge Independent School expects the highest standards of conduct from all employees and will treat seriously any concern raised about illegal or improper conduct.

Any individual covered by this policy will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the Headteacher (or the Proprietors, if the concerns relate to the Headteacher) any serious impropriety or breach of procedure. Employees who do not follow the steps identified in this procedure or other agreed internal procedures, and take their concerns to other outside sources (e.g. the press), may be subject to a formal disciplinary investigation.

This policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible
- Reassure individuals that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all staff in the school know how to raise concerns about potential wrongdoing in or by the school
- Set clear procedures for how the school will respond to such concerns
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the school in any capacity including agency workers, self-employed consultants or contractors who provide services on a personal basis.

## 2/ Principles

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue

No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern

Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence

If misconduct is discovered as a result of any investigation under this procedure the matter will be considered under the disciplinary procedure, in addition to any appropriate external measures

Maliciously making a false allegation is a disciplinary offence

An instruction to cover up wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, employees should not agree to remain silent

## 3/ Legislation

The requirement to have clear whistle-blowing procedures in place is set out in the [Academies Financial Handbook](#) and as an independent school, we commit to the six requirements detailed in Part 2: 2.41 to 2.46

This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

This policy complies with our funding agreement and articles of association.



## **4/ Definition of whistle-blowing**

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistle-blowing include (but aren’t limited to):

- Criminal offences, such as fraud or corruption
- Pupils’ or staffs’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the trust count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

The charity, Protect (formerly called Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful
- A free and confidential advice line: 02031172520

## **5/Procedure for staff to raise a whistle-blowing concern**

### **5.1 When to raise a concern**

Staff should consider the examples in section 3 when deciding whether their concern is of a whistle-blowing nature.

Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

### **5.2 Who to report to**

Staff should report their concern to the Head Teacher. If the concern is about the Head Teacher or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Proprietor.

### **5.3 How to raise the concern**

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

## **6/ School procedure for responding to a whistle-blowing concern**

### **6.1 Investigating the concern**

When a concern is received by the Head Teacher or Proprietor, - referred to from here as the ‘recipient’ - they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a representative from a trade union or professional association
- Collect as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure

- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
  - The recipient should then arrange a further investigation into the matter, involving the Head Teacher and/or the proprietor, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others cases, they may need to report the matter to the police
  - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

## 6.2 Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the Head Teacher, proprietor and other appropriate staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

## 7/ Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

## 8/ Escalating concerns beyond the school

The school encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included here:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies#education>

The charity, **Protect** whose advice line, is linked to in Section 4 of this policy, can also help staff when deciding whether to raise the concern to an external party.

## 9/ Approval

This policy will be reviewed every three years.

These procedures have been agreed by the proprietor, who will approve them when they are reviewed.

## 10/ Links with other policies

This policy links with our policies on:

- Staff grievance policy
- Complaints procedure
- Safeguarding and child protection policy

## Anti-bullying Policy

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## 1 1. Introduction

West Lodge Independent School is committed to providing safe, nurturing, friendly and personalised learning environments for all of our pupils to enable them to learn to the best of their abilities. As a member of the Anti-Bullying Alliance (ABA), set up by the NSPCC and the National Children's Bureau in 2002, our school shares the organisation's nine core values which can be found here: [ABA Aims and Values](#)

## 2/ Aims

- To ensure that all members of the school community are aware that bullying of any form is unacceptable
- The proprietor, Head Teacher, teaching and support staff, visitors, pupils and parents will have an understanding of what bullying is.
- The proprietor, Head Teacher, teaching, non-teaching staff and visitors will know and understand what the school's policy is on bullying, and the procedures to follow when bullying is reported.
- All pupils, parents and carers will understand what the school's policy is on bullying, what they should do if bullying arises, and how it will be dealt with
- To raise awareness of the nature and impact of bullying and recognising signs of bullying between all groups within the school community, pupils and adults
- To clarify systems in place to prevent and address bullying
- To ensure that any incidents of bullying are dealt with promptly, fairly and effectively
- To increase understanding for both victims and bullies and to help build an anti-bullying ethos within the school

## 3/ What Is Bullying?

The term bullying refers to a range of harmful behaviours, both physical and psychological. All bullying behaviour has the following four features:

- It is repetitive and persistent
- It is intentionally harmful
- It involves an imbalance of power
- It causes feelings of distress, fear, loneliness and lack of confidence in those who are at the receiving end
- Bullying is the use of aggression with the intention of hurting another person. This includes both physical and emotional bullying. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional- being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures)
- Physical - pushing, kicking, hitting, punching or any use of violence
- Racist - racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments

- Homophobic - because of, or focussing on the issue of sexuality
- Verbal - name-calling, sarcasm, spreading rumours, teasing
- Religious - related to religious beliefs and practices
- Cultural - related to cultural beliefs and practices
- Cyber – Use of information and communications technology, such as social media mobile phones and associated technology including spreading and editing of images without permission
- Due to SEN or disabilities
- Related to appearance of health conditions
- Related to home circumstances
- Due to disagreement and difference.

#### **4/ Signs and Symptoms**

A young person may indicate by signs or changes in behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a young person changes their behaviour in the following ways:

- is frightened of walking to or from activity areas or alternative teaching locations
- doesn't want to go on the public bus
- changes his/her usual routine
- has changes in moods
- is unwilling to go to an alternative teaching location or activity area
- begins to not attend teaching sessions
- runs away
- says he/she is feeling unwell e.g. stomach aches
- becomes withdrawn, anxious, or lacking in confidence
- starts stammering
- attempts or threatens suicide
- cries themselves to sleep at night or has nightmares
- feels ill in the morning
- begins to do poorly in academic work
- has possessions which are damaged or " go missing"
- asks for money or starts stealing money
- has monies continually "lost"
- has unexplained cuts or bruises

- becomes aggressive, disruptive or unreasonable
- is bullying other children or siblings
- stops eating
- is frightened to say what's wrong
- gives improbable excuses for any of the above
- is afraid to use the internet or mobile phone
- is nervous and jumpy when a message is received or is constantly checking messages These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated

These signs and behaviours *could* indicate other problems, but bullying should be considered a possibility and so investigated.

## **5/ Procedures**

1. Pupils will be encouraged to report bullying incidents to staff. All pupils have a trusted adult that they can go to if they have any issues.
2. Pupil bystanders will be encouraged and supported to report any incidents of bullying that they have witnessed.
3. In cases of serious bullying, the incidents will be recorded by staff as a safeguarding cause for concern.
4. In all cases, parents, Social workers or carers of both parties and will be informed and the problem will be discussed (separately or together as appropriate).
5. If necessary and appropriate, police will be consulted.
6. The bullying incident will be investigated and strategies put in place to prevent it happening in the future.
7. All pupils involved in the incident (victim and perpetrator) will be provided with appropriate support if required.

The Head Teacher, with the Lead Teacher, will be responsible for co-ordinating all the reported incidents and analysing any emerging patterns. They will report to the Proprietor and feedback to staff any action points arising to implement to improve practice.

## **6/ Responsibilities**

### **6.1 The Head Teacher**

- To fully investigate reported incidents
- To ensure that appropriate support is provided to both the victim and the bully, based on their individual needs
- To inform parents/carers and/or social workers of both the bully and the victim
- To impose strategies and sanctions in accordance with and proportionate to the seriousness of the incident which may include:
  - Supporting the bully to change their behaviour through the curriculum and one to one sessions
  - Using peer group pressure to discourage bullying
  - Discussions with parents/carers
  - Withdrawal from break and lunch time activities
  - Withdrawal from lessons (the student will work one to one under direct supervision of the most senior member of staff available)
  - Fixed term exclusion
  - In the most serious or persistent cases the school may consider permanent exclusion

- Police intervention where the situation warrants it
- The Head Teacher must also recognise that staff may be the subject of bullying either by another adult or a student. In such cases the same procedure is to be followed.

## 6.2 The responsibility of staff:

- To ensure that they are aware of the school's anti-bullying and safeguarding policies
- To ensure that they are aware of the signs of possible bullying
- To ensure that they are available to listen to a pupil's concerns regarding bullying.
- To create, through curriculum planning and delivery, and pastoral support, a safe and caring environment which promotes the social and emotional aspects of learning

## 7/ Anti-bullying strategy and prevention

In line with the school's commitment to develop and sustain an anti-bullying ethos, prevention will be a key focus of learning. Its aims are to:

- prevent, de-escalate and/or stop any continuation of harmful behaviour
- react to bullying incidents in a reasonable, proportionate and consistent way
- safeguard the student who has experienced the bullying
- apply disciplinary sanctions to the bully
- provide support to both the victim and the bully
- raise awareness to staff and pupils via policies, the curriculum and one to one sessions

and may include:

- teaching about bullying as part of our Personal Development Curriculum (PSHE) programme
- participating in activities during anti-bullying week
- involving pupils in drawing up the anti-bullying charter for the school
- writing stories or poems or drawing pictures about bullying
- reading stories about bullying
- making up role-plays
- having discussions about bullying and why it matters in Personal Development Curriculum (PSHE) sessions
- provision of activities to build resilience, self-confidence and self-esteem
- pupil awareness raising sessions on inappropriate use of the internet for bullying e.g. cyberbullying, sexting and how to deal with incidents
- advice for parents and carers on inappropriate use of the internet for bullying e.g. cyberbullying, sexting and how to deal with incidents, published on our school website
- involving staff in anti-bullying training activities including how to advise children and young people to stay safe online.

## 8/ Support organisations

Childline 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

Advisory Centre for Education (ACE) 020 7354 8321

Children's Legal Centre 0845 345 4345

KIDSCAPE Parents Helpline (Mon-Fri, 10-4) 0845 1 205 204

Parentline Plus 0808 800 2222

Youth Access 020 8772 9900

Bullying Online [www.bullying.co.uk](http://www.bullying.co.uk)

Visit the Kidscape website [www.kidscape.org.uk](http://www.kidscape.org.uk) for further support, links and advice.

## **9/ Training**

All new staff members will receive focused training from a suite of short courses run by the Anti-Bullying Alliance which includes:

- What is bullying?
- Bullying and the Law
- Bullying and SEN/disability
- 10 principles to reduce bullying
- Preventing bullying
- Responding to bullying
- Cyberbullying (Online bullying)

## **10/ Monitoring arrangements**

As part of the monitoring of the impact of the policy and procedures it describes, the school completes the Anti-Bullying Alliance baseline audit indicator which enables a full audit of the school's work. From 2020/21, the findings or actions of the baseline will inform the school's improvement plan (SIP)

This policy will be reviewed annually by the Head Teacher. At every review the policy will be shared with and approved by the proprietor.

## **11/ Links to other policies**

This policy should be read in conjunction with:

- Safeguarding and Child Protection Policy
- Behaviour and Relationships Policy
- Use of Reasonable Force Policy
- Online safety Policy



## Appendix 1 – Cyberbullying Policy

Young people have fully embraced the use of information and communication technologies for a variety of activities, including to maintain contact with friends and make new ones. Activities include sending e-mails, creating their own websites, posting intimate personal news in blogs (online interactive diaries), sending text messages and images via mobile phones, messaging each other through direct messaging, using vlogs, social media and games consoles. While most interactions are positive, these technologies can be used to harass and intimidate others. This is known as cyber bullying.

### Definition

“Cyber bullying is when someone is tormented, threatened, harassed, humiliated, embarrassed, or otherwise targeted by another individual using the Internet, interactive and digital technologies or mobile phones. It has to be a minor on both sides, or at least have been instigated by a minor against another minor.”

[www.stopcyberbullying.org](http://www.stopcyberbullying.org)

West Lodge Independent School is committed to developing a safe environment where the students act respectfully and positively towards each other in acceptable and non-threatening ways.

### Procedures

Staff at our school have the responsibility to ensure that:

- staff are aware of cyber bullying and are able to identify and look for signs of occurrence among the pupils.
- pupils are aware of the consequences of cyber bullying.
- a code of conduct is in use for technology, including computers and mobile phones, whilst on the school premises.
- all cases of cyber bullying are reported to the Head Teacher in the first instance, and responded to promptly.
- incidents of cyber bullying are treated in line with safeguarding procedures.
- there is supervision of technology that is effective for monitoring and deterring cyber bullying.

Pupils at West Lodge Independent School have a responsibility to ensure that they:

- do not participate in cyber bullying
- do not use mobile phones, cameras or other digital devices to record audio and visual material that is not authorised as part of the curriculum program.
- do not breach the privacy of students, staff and members of the wider community through any unauthorised recording or filming.
- do not disseminate inappropriate information through digital media or other means.
- report incidents of cyber bullying to a member of staff.

- advise other pupils being victimised by cyber bullying to talk to an adult
- offer to speak to an adult on behalf of the student who is being victimised by cyber bullying.
- 
- .

## Online Policy

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## 1/ Introduction

ICT is seen as an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults. The technology covers a wide range of resources including; web-based and mobile learning. It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole. Currently the internet technologies children and young people use both inside and outside of the classroom include:

- Websites
- Apps
- E-mail, Instant Messaging and chat rooms
- Social Media, including Facebook and Twitter
- Mobile/Smart phones with text, video and/or web functionality
- Other mobile devices including tablets and gaming devices
- Online Games: single mode, co-op, parties, game chat etc
- Learning Platforms and Virtual Learning Environments
- Blogs and Wikis
- Podcasting
- Video sharing
- Downloading
- On demand TV and video, movies and radio / Smart TVs

Whilst exciting and beneficial both in and out of the context of education, much ICT, particularly web-based resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these Internet technologies and that some have minimum age requirements.

At West Lodge Independent School we understand the responsibility to educate our students about online safety issues; teaching them the appropriate behaviour and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom.

Everybody in the school community has a shared responsibility to secure any sensitive information used in their day to day professional duties and even staff not directly involved in data handling should be made aware of the risks and threats and how to minimise them.

Both this policy and the Acceptable Use Agreement (for all staff, regular visitors and students) are inclusive of both fixed and mobile internet; technologies provided by the school (such as PCs, laptops, mobile devices, webcams, whiteboards, voting systems, digital video equipment, etc); and technologies owned by students and staff, but brought onto school premises (such as laptops, mobile phones and other mobile devices).

## 2/ Aims

Our school aims to:

Have robust processes in place to ensure the online safety of pupils, staff, volunteers and the proprietor

Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology

Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

## 3/ Legislation and guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on: Teaching online safety in schools

Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff

Relationships and sex education

Searching, screening and confiscation

It also refers to the Department's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

This policy complies with our funding agreement and articles of association.

## 4/ Roles and Responsibilities

Online safety is an important aspect of strategic leadership within the school, and so the Head Teacher has ultimate responsibility to ensure that the policy and practices are embedded and monitored. The named Online Safety Lead is James Connor, Head Teacher. All members of the school community have been made aware of who holds this post. It is the role of the Online Safety Lead to keep up to date with current issues and guidance through organisations such as CEOP (Child Exploitation and Online Protection) and Childnet.

### 4.1 Governance

The proprietor has overall responsibility for monitoring this policy and holding the head teacher to account for its implementation.

The proprietor will:

- co-ordinate regular meetings with appropriate staff to discuss online safety, and monitor online safety logs as provided by the Designated Safeguarding Lead (DSL).

The proprietor will:

- Ensure that they have read and understand this policy

- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (Appendix 2)

#### **4.2 The Head Teacher**

The Head Teacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

In addition, liaising with the ICT support contractor, Plan IT, to:

- Ensure appropriate filtering and monitoring systems are in place, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school. This includes terrorist and extremist material
- Ensure that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conduct a full security check and monitor the school's ICT systems on a monthly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged using the schools Record of Concern form (please see the school's Safeguarding and Child Protection Policy) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

#### **4.3 The Designated Safeguarding Lead**

Details of the school's DSL are set out in our safeguarding and child protection policy as well relevant job descriptions.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting staff to understand this policy and to check that it is being implemented consistently throughout the school
- Working with the head teacher and other staff, as necessary, to address any online safety issues or incidents
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)

- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the proprietor

This list is not intended to be exhaustive.

#### **4.4 All staff and volunteers**

All staff, including contractors and agency staff, and volunteers are responsible for:

- Ensuring they read and understand this policy
- Implementing this policy consistently in their work
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems (Appendix 2) and the internet and ensuring that pupils follow the school's terms on acceptable use (Appendix 1)
- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

#### **4.5 Parents and Carers**

Parents and carers are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (Appendix 1)

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

What are the issues? - [UK Safer Internet Centre](#)

Hot topics - [Childnet International](#)

Parent factsheet - [Childnet International](#)

#### **4.6 Visitors and members of the community**

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (Appendix 2).

## 5/ Educating pupils about online safety

Online safety is included in the Programmes of Study for all Key Stages to help ensure that young people are "responsible, competent, confident and creative users of information and communication technology."

Aside to the computing curriculum, PSHE and SRE provide opportunities for approaching a range of key online safety issues such as cyberbullying, safe social networking, healthy digital behaviour, pornography, sexting, privacy and online reputation.

From September 2020\* **all** schools will have to teach:

[Relationships and sex education and health education](#) in secondary schools

From September 2020, In **Key Stage 3**, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Pupils in **Key Stage 4** will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the **end of secondary school**, they will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners



- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours

The safe use of social media and the internet will also be covered in other subjects where relevant.

In addition, the school will use tutor sessions to raise pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to pupils about this.

## **6/ Educating parents and carers about online safety**

The school will raise parents' and carers awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents.

Online safety will also be covered during parents' evenings/meetings.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the head teacher who is also the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

## **7/ Cyber-bullying**

### **7.1 Definition**

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the school's Behaviour and Relationship Policy.)

### **7.2 Preventing and addressing cyber-bullying**

To help prevent cyber-bullying, we will make sure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, the proprietor and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils. This is part of safeguarding training (see Section 12 for more detail).

The school also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour and relationship policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable measures to ensure the incident is contained.

The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is decided necessary to do so.

### **7.3 Examining electronic devices**

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the Head Teacher/DSL to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police

Any searching of pupils will be carried out in line with the DfE's latest guidance on [screening, searching and confiscation](#).

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

### **8/ Acceptable use of the internet in school**

All pupils, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet (Appendix 2. Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above.

More information is set out in the acceptable use agreements in Appendices 1 and 2.

### **9/ Pupils using mobile devices in school**

Please read this section in conjunction with the school's Mobile and Smart Phone and BYOD Policies.

A mobile or smart phone is a useful tool for life and this is recognised by our school. However, to support our pupils' engagement, focus and progress, mobile and/or smart phones are not permitted in school.

### **10/ Staff using work devices outside school**

Please read this section in conjunction with the school's Mobile and Smart Phone Policy.

Staff members using a work device outside school must not install any unauthorised software on the device and must not use the device in any way which would violate the school's terms of acceptable use, as set out in Appendix 2.

Staff must ensure that their work device is secure and password-protected, and that they do not share their password with others. They must take all reasonable steps to ensure the security of their work device when using it outside school. Any USB devices containing data relating to the school must be encrypted.

If staff have any concerns over the security of their device, they must seek advice from the ICT manager.

Work devices must be used solely for work activities.

### **11/ How the school will respond to any issues of misuse**

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our policies on (behaviour and ICT and internet acceptable use). The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the [staff disciplinary procedures/staff code of conduct]. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

### **12/ Training**

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

The DSL will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

The proprietor will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our Safeguarding and Child Protection Policy.

### **13/ Monitoring arrangements**

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 5.

This policy will be reviewed annually by the Head Teacher. At every review, the policy will be shared with and approved by the proprietor.

### **14/ Links**

This online safety policy is linked to our:

- Safeguarding and Child Protection policy
- Behaviour and Relationship policy
- Staff disciplinary procedures
- Data Protection policy and Privacy Notices
- Complaints procedure
- ICT and Internet Acceptable Use policy
- Mobile and Smart Phone policy

#### **\*Addendum:**

[June 2020 DfE Communication to schools on the implementation of Relationships Education](#): Following an assessment of preparedness, schools should commence teaching as soon as practically possible or use the time to prepare to deliver the new curriculum. This includes engaging parents on their policy as well as planning their curriculum provision.

In line with this update, West Lodge Independent School will begin an assessment of readiness for the implementation of this curriculum from September 2020.

## Appendix 1:



### Acceptable use of the school's ICT systems and internet: agreement for pupils, parents/carers

**Name of pupil:**

**I will read and follow the rules in the acceptable use agreement policy**

**When I use the school's ICT systems (like computers) and get onto the internet in school I will:**

- Always use the school's ICT systems and the internet responsibly and for educational purposes only
- Only use them when a member of staff is present, or with their permission
- Keep my username and passwords safe and not share these with others
- Keep my private information safe at all times and not give my name, address or telephone number to anyone without the permission of a member of staff or parent/carer
- Tell a member of staff (or sensible adult) immediately if I find any material which might upset, distress or harm me or others
- Always log off or shut down a computer when I'm finished working on it

**I will not:**

- Access any inappropriate websites including: social networking sites, chat rooms and gaming sites unless my teacher has expressly allowed this as part of a learning activity
- Open any attachments in emails, or follow any links in emails, without first checking with a teacher
- Use any inappropriate language when communicating online, including in emails
- Log in to the school's network using someone else's details
- Arrange to meet anyone offline without first consulting my parent/carer, or without adult supervision
- Bring my own mobile or smart phone

**I understand that the school will monitor the websites I visit and that there may be consequences if I don't follow these rules.**

**Signed (pupil):**

**Date:**

**Parent/carer's agreement:** I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for pupils using the school's ICT systems and internet, and for using personal electronic devices in school, and will make sure my child understands these.

**Signed (parent/carer):**

**Date:**

## Appendix 2:



### Acceptable use of the school's ICT systems and internet: agreement for staff, the proprietor, volunteers and visitors

**Name:**

**When using the school's ICT systems and accessing the internet in school, or outside school on a work device (if applicable), I will not:**

- Access, or attempt to access inappropriate material, including but not limited to material of a violent, criminal or pornographic nature (or create, share, link to or send such material)
- Use them in any way which could harm the school's reputation
- Access social networking sites or chat rooms
- Use any improper language when communicating online, including in emails or other messaging services
- Install any unauthorised software, or connect unauthorised hardware or devices to the school's network
- Share my password with others or log in to the school's network using someone else's details
- Take photographs of pupils without checking with first with the school's DSL
- Share confidential information about the school, its pupils or staff, or other members of the community
- Access, modify or share data I'm not authorised to access, modify or share
- Promote private businesses, unless that business is directly related to the school

I will only use the school's ICT systems and access the internet in school, or outside school on a work device, for educational purposes or for the purpose of fulfilling the duties of my role.

I agree that the school will monitor the websites I visit and my use of the school's ICT facilities and systems.

I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school, and keep all data securely stored in accordance with this policy and the school's data protection policy.

I will let the designated safeguarding lead (DSL) and ICT manager know if a pupil informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.

I will always use the school's ICT systems and internet responsibly, and ensure that pupils in my care do so too.

**Signed (staff member/governor/volunteer/visitor):**

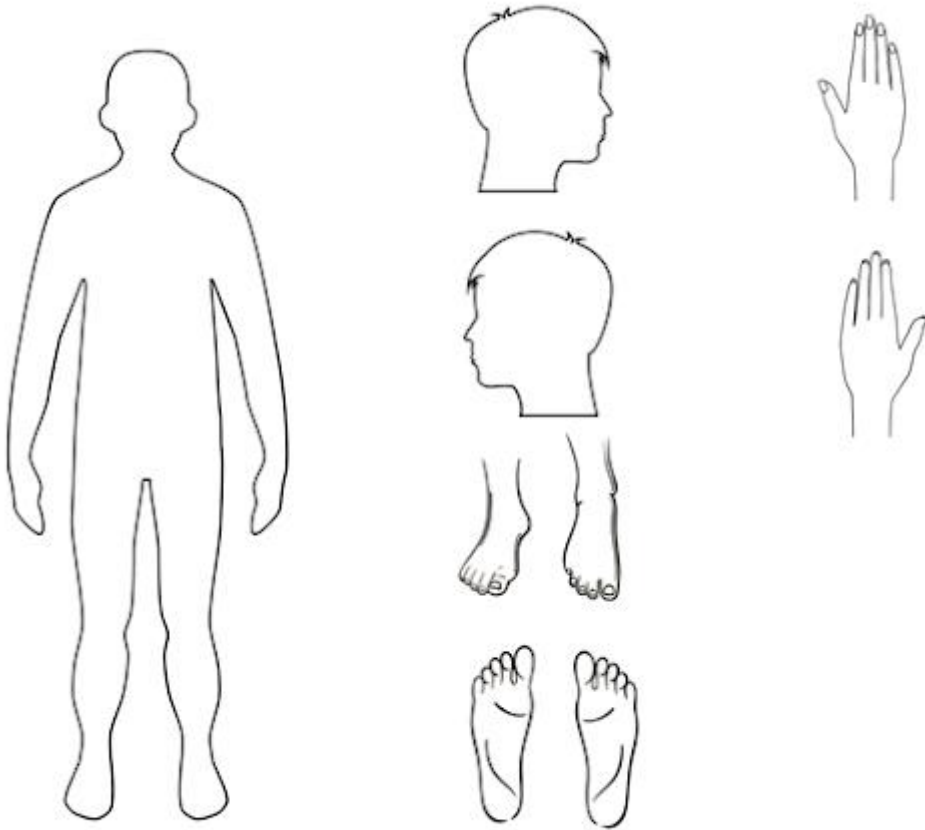
**Date:**

### Appendix 3:

Online safety training needs audit	
Name of staff member/volunteer:	Date:
Question	Yes/No (add comments if necessary)
Who has lead responsibility for online safety in school?	
What must you do if a pupil approaches you with a concern or issue?	
State key points from the school's acceptable use agreement for staff, volunteers, governors and visitors?	
State key points from the school's acceptable use agreement for pupils and parents?	
How often should you change your password for accessing the school's ICT systems?	
Summarise the school's approach to tackling cyber-bullying?	
What areas of online safety would you like training/further training on?	







**Record written account of the injury(ies) below and details of any first aid that is given:**

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**Signature of staff (including trained First Aider) completing this record on page 2:**

**Now, pass this Record of Concern form immediately to the school's DSL**

**West Lodge Independent School  
Designated Safeguarding Lead: Record of Action**



**Staff name:**

**Role:**

**Date:**

**Time of disclosure/concern/incident:**

**Name of child:**

**DoB:**

**Time of this record of action:**

**Below, record full details of all follow up and actions.**

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Case open:

Case closed:

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Signature of Panel Lead:

## Missing Children Policy

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## 1/ Introduction

At West Lodge Independent School, the majority of our pupils are in the care of a Local Authority but this policy is devised to provide guidance for staff which provides swift and appropriate responses to any and every incident of a missing child or young person. It is vital that the best possible and proportionate response is deployed to those most at risk from harm, enabling the police to focus on more serious incidents and proactive safeguarding. This means that procedures need to be in place to ensure that the correct cases are identified so that resources go where they are most needed time.

## 2/ Aims

This policy aims to

- Make clear the school's commitment to best practice and ensuring tight protocols are implemented and followed when a pupil goes missing

## 3/ Legislation, Guidance and Information

This policy is written with reference to and in line with:

**Statutory guidance on children who run away or go missing from home or care Jan 2014:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307867/Statutory\\_Guidance\\_-\\_Missing\\_from\\_care\\_3\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf)

**DfE Flowchart when a child goes missing from care:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/271820/Flowchart\\_when\\_a\\_child\\_goes\\_missing\\_from\\_care.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/271820/Flowchart_when_a_child_goes_missing_from_care.pdf)

**Keeping Children Safe in Education September 2019:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835733/Keeping\\_children\\_safe\\_in\\_education\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf)

**HMG Working Together to Safeguard Children 2018:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)

**Suffolk SCB Missing Children:**

<https://www.suffolkscb.org.uk/safeguarding-topics/missing-children/>

**NCA Missing People Data Report 2016-17:**

<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/304-2016-17-ukmpu-data-report-v1/file>

## 4/ Causes of Running Away

There are no exact figures for the number of children who go missing or run away, and these figures are contentious but estimates suggest that the figure is in the region of 100,000 per year. 'Push' and 'pull' factors may be evident with some children; some children sometimes ran *to* a situation that presented risks to them while some ran *away* from something or someone. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else.

There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse. Other reasons that cause a child in residential care to run away may include:

- Problems within the placement – such as from arguments with, or conflict with peers or disagreements with carers.
- Bullying, racial harassment, homophobia, either within the home or in the local community.
- Mental health problems.
- Teenage pregnancy.
- Wanting to be near friends or family – especially when a young person is in care and there are problems in contact arrangements with family and friends
- Grooming for sexual exploitation – evidence suggests that 90% of children subject to sexual exploitation go missing at some point.
- Forced Marriage- some young people run away because they are at risk of or in a forced marriage.
- Child Trafficking- young people may go missing when they are being trafficked.

It is important to be concerned for the safety and wellbeing of a child or young person who goes missing in terms not only of what might happen to them whilst missing, but also because of their reasons for doing so.

#### **4.1 Risk Assessment and Prevention**

Every child at West Lodge Independent School will be assessed prior to their admission. This must include details of any previous instances of going missing, the causes, outcomes, likelihood of re-occurrence etc. A child may have been admitted to one of the company's residential homes even though there is a perceived risk of running away, providing the home and the placing authority have agreed strategies to reduce the risk, a protocol for dealing with an incident, and follow up actions such as return interviews. Placing the child in an appropriate placement should help to minimise the risk of the child running away.

Whether a pupil is living in the care of a local authority or with parents, the school will liaise closely with the Parents, Family and/or Carers: Foster Family, Residential Home staff team, Social Workers to ensure a joined up and collaborative approach is taken to ensure the child/young person is safe

All of these factors will be considered when a pupil's school-based risk assessment is drawn up and mitigating strategies will be included. These will vary from one child or young person to the next. However, strategies may include:

- Consultation with the pupil on why they would want to run away. Emphasis to be placed on them understanding that their opinions will be listened to and taken seriously.
- De-escalation strategies discussed with the pupil should any 'run away' triggers occur.
- Consultation with significant others such as family, friends and other professionals. In particular with those to whom a pupil may want to run.
- Staff awareness – for example, we know that children in care who are placed at some distance away from their local authority are particularly vulnerable as evidence suggests that distance from home, family and friends is a key factor for looked after children running away.
- Any issues relating to the vulnerability of the pupil to sexual exploitation, trafficking or criminal or gang involvement should be identified and shared as appropriate.

- A detailed Pupil Individual Education Plan (PIEP) and Pupil Individual Risk Assessment (PIRA) which take the pupil's needs into account is written and implemented as a priority
- Where a pupil already has an established pattern of running away, the Pupil Individual Education Plan should include a strategy to keep them safe and minimise the likelihood of the pupil running away in the future.
- Information sharing with all relevant people: family, other professionals.
- Every pupil to join the school's reward and target systems. If appropriate, a target may include an element of 'staying safe'.
- Staff to be fully briefed and trained on the risks and strategies to prevent occurrences.
- PSHE curriculum to include: visits from Safer Neighbour Team Police Officer to highlight local issues and re-enforce personal safety; workshops to include staff and pupils to explore the dangers of sexual exploitation
- Allocation of a key member of staff for the pupil to work with. Regular review of risk with the pupil.
- Pupil to have access to a trusted adult in school.
- The pupil to have all relevant numbers so that they feel informed. This may include, if appropriate: Social Worker, IRO, Childline, Ofsted and Advocate

## **5/ When a Child goes missing**

**Every pupil will have an individual missing person protocol which will be included in their Pupil Individual Risk Assessment (PIRA). This will be agreed upon admission and updated when required. This will be the document that staff will refer to and use when a young person's whereabouts is unknown.**

School staff need to remain vigilant regarding the whereabouts of all children, regardless of their level of development or age. The Pupil Individual Risk Assessment (PIAP) is one of the key documents which staff should be fully familiar with.

Some children go missing for short periods for example inadvertently leaving the group while on a school trip. Some may be accidentally or deliberately late to school and their whereabouts are known and their safety or wellbeing is not necessarily jeopardised.

Staff need to consider each pupil individually and refer to their risk assessments and any protocols that are in place. If a child has accidentally become separated from the group while away from school on a trip the specific trip protocol will be triggered. This may include contacting them via their mobile phone and/or returning to the pre-agreed meeting point. Staff need to ensure that the number of staff allocated for these tasks do not place other children at risk.

If all options have been explored and the pupil has not been located staff should consider contacting the police. At this point staff should speak to the Head Teacher and inform them of the situation and their intention to contact the police, the matter can then quickly be reviewed to ensure clarity of the situation and the need for police involvement.

There may be situations when the police need to be contacted immediately (without speaking to the Head Teacher). This may include:

- evidence that a pupil has already left the local area and their whereabouts and intended destination is not known or is a cause for their safety.
- if the staff have a belief or evidence that the pupil may be/is the subject of a crime or is at risk of harm to themselves and /or others.

- if the pupil's whereabouts cannot be established and where it is out of character for them to go missing.
- if a child is known to have been abducted or forcibly removed from school, this is a 'crime in action' and should be reported to the police immediately.

Before contacting the police, staff should consider factors such as:

- The age and vulnerability of the child
- The setting in which they go missing i.e remote rural area, town centre
- The time of day and weather conditions i.e approaching nightfall
- Other significant risk factors i.e potential for self-harm, need for medication
- Who the child may be associating with
- Any previous history of running away
- Any current issues that give added cause for concern i.e conflict with peers, at home etc

When staff contact the police they should use 999. They need to have the pupil's details at hand as well as all the related details of the incident. Details to hand should include:

- Physical appearance & clothes worn,
- Medical needs
- Likely areas or addresses to be checked
- The child's access to money or transport
- The child's mobile phone number
- Actions taken by staff so far, further actions to be taken by staff
- The Risk Assessment for the child
- Any significant behaviours related to possible harm i.e. self – harm, suicide, drugs, sexual exploitation, criminal behaviour
- Any relevant information about the pupil's presentation in the period leading up to the incident

Where there is ever a doubt over the safety of a pupil, they will be classified as 'missing' and treated in the appropriate manner.

Once a child/young person has been allocated a status, the Head Teacher or nominated representative of the Head Teacher, must inform other relevant parties without undue delay: family, carers, residential home manager, Social Worker. They must ensure all details of the incident are recorded accurately and in sufficient detail. This should be done on an Incident Report Form and linked to/with school's Safeguarding Record of Concern form.

## 5.1 Support for pupils

The following links provide key support for children and young people:

### [Safecall](#)

The Safecall team provides a debrief service to children and young people who have recently been missing and have potentially come into contact with gangs or involved in county lines.

**Operating hours for the Safe Call team:** Monday to Friday, 9am to 6pm

**SafeCall Telephone:** 020 8392 5710

**SafeCall E-mail:** [SafeCall@missingpeople.org.uk](mailto:SafeCall@missingpeople.org.uk)

### [Missing People](#)



Missing People is a free confidential service to children and young people who may have been involved in gangs or county lines and have regular missing episodes. They accept self-referrals from children and young people and referrals from external professionals and agencies (police, social services, schools, charities, youth organisations etc). They work closely with children, young people and their parents/carers to ensure that the risk of exploitation is minimised and ensure that information is shared between social workers, youth workers and other services that they may be receiving support from.

Their main objective is to provide a confidential child led service, drawing up safety plans to minimise future exploitation and reduce the risks of missing episodes reoccurring. Their values are to offer a non-judgemental service to ensure that children/young people have a safe space to talk about their experiences in confidence. They also support the families and carers of those who have missing episodes; providing them with emotional support and guidance.

**24/7 Helpline: 116 000**

**24/7 Helpline E-mail: [116000@missingpeople.org.uk](mailto:116000@missingpeople.org.uk)**

## **5.2 Media Strategy**

The police have responsibility for any missing person enquiry and will decide whether media involvement will assist or hamper the enquiry.

A decision to use the media will only be made after consultation between the police and Social Services. Where appropriate, the parents and/or carers should also be involved. Staff do not have the authority to allow media input into an enquiry and must direct all enquiries of this nature to the police.

Should any part of the media contact West Lodge regarding a missing child enquiry the staff member is to inform them that all enquiries should be directed to the Head Teacher or proprietor. The Head Teacher will direct all media enquiries to the relevant person within the police force.

## **5.3 Children in Care: out of area placements**

Statistically, and historically, the majority of residents at West Lodge Independent School live in one of the two residential care homes: Liberty or Fern Lodge and are accommodated there by local authorities other than Suffolk County Council.

If a child who is placed out of area runs away, the local Runaway and Missing from Home and Care (RMFHC) protocol must be followed. At all times school staff, overseen by the Head Teacher, will liaise closely with the Home's Manager and/or Key Worker.

## **5.4 Planning for return**

The attitude of professionals, such as West Lodge Independent School staff, Residential Home staff, police officers and social workers, towards a child who has been missing can have a big impact on how they will engage with subsequent investigations and protection planning. However, "streetwise" they may appear, they are children and may be extremely vulnerable to multiple risks. A supportive approach, actively listening and responding to a child's needs, will have a greater chance of preventing the child from going missing again and safeguarding them against other risks. Running away should never be viewed as a behaviour that needs to be punished. It is a communication that needs to be understood.

If the child is located but the professionals involved are unable to establish meaningful contact with the child, perhaps because the child is under duress or being harboured, then Children's Social Care will

consider whether an application for a recovery order is required. If the pupil is in the care of a residential home, the home's manager is responsible for liaising with the child's Social Worker and police to coordinate the return of the child/young person. Children's Social Care will consider whether the child should be returned to their placement. When the pupil returns to school, all staff will continue to offer warm and consistent support. If the pupil is in the care of a local authority, an early LAC Review may be convened to address issues for the child and placement. The school will contribute to this review.

If the pupil is returned to school during school times, their immediate needs must be met (food, drink, warm dry clothing etc). If regular medication has been missed, guidance should be sought as to what remedial steps to take. The pupil must be offered the opportunity to speak to an independent person (this may be a police officer if they are involved or a Social Worker or an advocate if they are available.)

### **5.5 Safe and well checks**

Safe and well checks are carried out by the police as soon as possible after a child reported as 'missing' has been found. They are not conducted for children who have been given 'absent' status. Their purpose is to check for any indications that the child has suffered harm, where and with whom they have been, and to give them an opportunity to disclose any offending by or against them. If school staff are in contact with the police regarding a missing child being located or returning, they should also enquire when they police are able to carry out a safe and well check. The child has a right to be supported by an adult of their choice when this check is being carried out. Only on the authority of a Superintendent will these checks not be carried out

Where a child goes missing frequently, it may not be practicable for the police to see them every time they return. In these cases, a reasonable decision will be sought in agreement between the police, the child's parents, carers, residential home or Social Worker. Regard must be given to the frequency of such checks bearing in mind the established link between frequent missing episodes and serious harm, which could include gang involvement, forced marriage, bullying or sexual exploitation. The reason for a decision not to conduct a safe and well check should be recorded and form part of the incident's paperwork.

### **5.6 Return Interviews**

When a pupil is found, they must be offered an independent 'return interview'. The interview should be carried out within 72 hours of the child returning to their home or care setting. This should be an in-depth interview and is normally best carried out by an independent person (ie, someone not involved in caring for the child) who is

trained to carry out these interviews and is able to follow-up any actions that emerge. Children sometimes need to build up trust with a person before they will discuss in depth the reasons why they ran away. A suitable person may be discussed and nominated to do this with the child's Social Worker at the planning stage of a child's placement. This may be a person from the local authority (Suffolk) or a representative of the placing authority i.e Advocate. School will offer its support and contribute to this process via the Head Teacher.

### **5.6 Risk Assessment and Management Review**

If a pupil is in care, the care provider must convene a multi-agency risk management meeting when young people run away persistently or engage in risky behaviour such as leaving the placement to meet with unfamiliar or inappropriate adults. These meetings will be particularly important when groups of young people run away together. The purpose of this is to develop a strategy with all relevant agencies for managing the risks which should be recorded in the care plan. The Head Teacher (or nominated representative) will attend these meetings and then relevant information will be included in the school's revised Pupil Individual Risk Assessment (PIRA)

If a pupil is not in care, the school will meet with all relevant parties such as parents, police officers to review the incident, discuss and agree strategies to support all parties to manage the risk. These will be recorded in the revised Pupil Individual Education Plan (PIEP)

### **5.7 Children who repeatedly go missing from care**

Repeatedly going missing should not be viewed as a normal pattern of behaviour. As an example, this type of behaviour may indicate sexual exploitation.

For those young people who repeatedly go missing and place themselves at risk of serious harm, consideration must be given to conducting enquiries under s47 Children Act 1989 with a Missing Child Strategy Discussion, or in some cases where the young person is placing themselves at a high level of risk, a multi-agency risk management meeting. As a minimum, discussions should be held with the child, their families or both to offer further support and guidance.

School staff will keep chronologies up to date for children who repeatedly go missing to assist in identifying patterns of absence or concerns. When and if appropriate and agreed, school staff may liaise with local organisations in order to provide a pupil with support (see Section 5)

### **6/ Monitoring**

This policy will be reviewed by the Head Teacher every year.

At every review, the policy will be approved by the Proprietor.

### **7/ Links to other policies**

Educational Visits Policy

Safeguarding and Child Protection policy

Admissions Policy

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Keeping children safe in education is our first priority and duty at West Lodge Independent school. We practice our legal and moral duty to ensure every child and young person is protected from harm. We believe that allegations and complaints against staff can be minimised by having:

- Safer Recruitment strategies in place
- Appropriate induction and training
- An open and transparent safeguarding culture
- A professional/staff code of conduct
- Regular briefing and discussion of safeguarding issues
- A curriculum which ensures that children are aware of safeguarding issues

## **2/ Scope**

This policy applies to all cases in which it is alleged that a current member of staff or volunteer has:  
Behaved in a way that has harmed a child, or may have harmed a child, or  
Possibly committed a criminal offence against or related to a child, or  
Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school or elsewhere. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

Our procedures for dealing with allegations will be applied with common sense and judgement. This policy should be read alongside our full Safeguarding Policy.

## **3/ Suspension**

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

### **3.1 Alternatives to suspension**

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

Temporary redeployment to another role within the company, Able Healthcare Ltd so that the individual does not have direct contact with the child or children concerned

Providing an assistant to be present when the individual has contact with children

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

## **4/ Definitions for outcomes of allegation investigations**

Substantiated: there is sufficient evidence to prove the allegations

Malicious: there is sufficient evidence to disprove the allegation and there has been deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

## **5/ Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the Head Teacher, and where the Head Teacher is the subject of the allegation the Proprietor, will take the following steps:

Discuss immediately, the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is

necessary to involve the police and/or children's social care services. (The case manager (Head Teacher or Proprietor) may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police). In our County, contact should be made with:

Rennie Everett or Dian Campbell  
LADO Team 0300 123 2044  
LADO@suffolk.gov.uk

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the Designated Officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with pupils at the school is justified or whether alternative arrangements such as those outlined above (see Section 2 Suspension) can be put in place. Advice will be sought from the LA Designated Officer, police and/or children's social services, as appropriate.

If immediate suspension is considered necessary, agree and record the rationale for this with the LA Designated Officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LA Designated Officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the LA Designated Officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Employee assistance support is available to all staff and details can be found in the Staff Handbook

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

## **5.1 Informing Ofsted**

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or

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

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

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

## **6/ Timescales**

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

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

## **7/ Specific actions**

### **7.1 Action following a criminal investigation or prosecution**

The Proprietor and/or Head Teacher will discuss with the Local Authority's Designated Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

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

If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the academy's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **7.3 Individuals returning to work after suspension**

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

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

### **7.4 Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Head Teacher, or other appropriate person in the case of an allegation against the Head Teacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

## **8/ Confidentiality**

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

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

Who needs to know about the allegation and what information can be shared

How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

What, if any, information can be reasonably given to the wider community to reduce speculation  
How to manage press interest if, and when, it arises

## **9/ Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

Such records will include:

A clear and comprehensive summary of the allegation

Details of how the allegation was followed up and resolved

Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## **10/ References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## **11/ Learning lessons**

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

This will include consideration of (as applicable):

Issues arising from the decision to suspend the member of staff

The duration of the suspension

Whether or not the suspension was justified

The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

## **12/ Monitoring arrangements**

In line with other linked policies such as Safeguarding and Child Protection Policy, this policy will be reviewed by the Head Teacher every year. This will be shared with the proprietor who will then approve the policy.

## **13/ Link with other policies**

This policy should be read in conjunction with the following documents:

- Safeguarding and Child Protection Policy
- Staff Handbook



**Safeguarding Group Policies  
Staff sign off sheet**

Please complete details below to acknowledge that you have read, understood and will follow this policy:

<b>Print name</b>	<b>Role</b>	<b>Signature</b>	<b>Date</b>