

Aylesbury UTC Safeguarding Policy

September 2023-24 - updated

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1. Aims

Appropriate action is taken in a timely manner to safeguard and promote children's welfare
All staff are aware of their statutory responsibilities with respect to safeguarding
Staff are properly trained in recognising and reporting safeguarding issues

2. Useful contacts

The Designated Safeguarding Lead (DSL) for Aylesbury UTC is:

Sarah Wood – Assistant Principal - Contact details: Main Number - 01296388463 or 01296388688 - Email: swood@aylesburyutc.co.

The Deputy Designated Safeguarding Lead for Aylesbury UTC is:

Joe Dunckley – Principal - Contact details: Main number – 01296 388454 or 01296388688 - Email: jdunckley@aylesburyutc.co.uk

The Safeguarding Officer for Aylesbury UTC is:

Kelly Rudgley - Contact details: Main number – 01296344688 - Email: krudgley@aylesburyutc.co.uk

The Chair of Governors for Aylesbury UTC is: Ken McCrea – Email: kmccrea@aylesburyutc.co.uk

If school is uncontactable (closed for the day, the weekend, or during school holidays) then the following numbers are useful points of contact:

LADO team – 01296 383962

The **Police** non-emergency number is: 101

Childline is: 0800 1111

The **Channel Helpline** (for raising concerns about extremism with respect to a pupil) is: 020 7340 7264

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#).

Aylesbury UTC complies with this guidance.

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on 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. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), FGM) appears to have been carried out on a girl under 18.

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[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

This policy also acknowledges the [Equality Act 2010](#) and the role school leaders and governors play in ensuring inclusion; the promotion of human rights; and equality.

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

4. Definitions and acronyms

Safeguarding and promoting the welfare of children means:

Protecting children from maltreatment

Preventing impairment of children's health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

Children includes everyone under the age of 18.

Upskirting is the taking of images or videos of a sexually intrusive nature up someone's skirt without their permission.

Victim is a widely recognised and understood term. Not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. This term is used in this document, but as a school we acknowledge when managing any incident we will use any term with which the individual child is most comfortable.

Alleged perpetrator(s) and perpetrator(s) these are widely used and recognised terms and do appear in this document. However, as a school this terminology is not widely used, especially when speaking in front of children. In some cases the abusive behaviour will have been harmful to the perpetrator as well.

Common acronyms used in this document:

CAMHS - Child and Adolescent Mental Health Services are services that support young people with their mental health.

CIN – Child in need. This is a form of social services plan and includes children who are aged under 18 and need local authority services to achieve or maintain a reasonable standard of health or development, or need local authority services to prevent significant or further harm to health or development.

CP – Child protection. This is another form of social services plan and represents measures and structures to prevent and respond to abuse, neglect, exploitation and violence affecting children. Child protection means safeguarding children from harm. Harm includes violence, abuse, exploitation and neglect.

CPOMS - Child Protection Online Management System. This is an online system used to record and create chronologies surrounding safeguarding and behavioural issues.

CSE – Child sexual exploitation. This is a type of sexual abuse. When a child or young person is exploited they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities.

DBS - Disclosure and Barring Service, once known as the CRB (Criminal Records Bureau) check, this is used as part of the recruitment process at school. All candidates need to have a valid DBS certificate before starting in their role.

DPA – Data protection act. This is based around eight principles of 'good information handling'. These give people specific rights in relation to their personal information and place certain obligations on those organisations that are responsible for processing it.

DSL – Designated safeguarding lead. This is the person in charge of safeguarding on school site on a day to day basis. All safeguarding concerns and disclosures are passed to this person for advice and further actions to be taken.

DDSL – Deputy designated safeguarding lead. This is the person in charge of safeguarding on school site on a day to day basis when the DSL is not present. In those situations all safeguarding concerns and disclosures are passed to this person for advice and further actions to be taken.

FGM – Female genital mutilation - is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting.

HBV – Honour based violence, is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community.

IICSA – Independent inquiry into child sexual abuse. This was an inquiry established to examine how the country's institutions handled their duty of care to protect children from sexual abuse.

LA – Local authority is an organization that is officially responsible for all the public services and facilities in a particular area. For Aylesbury UTC this is Buckinghamshire County Council.

LADO - Local Authority Designated Officer works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about the behaviour of an adult who works with children and young people.

LCSS - Locality and Community Support Service is an organisation that gives advice and guidance with regard to safeguarding and links into partner agencies across Buckinghamshire. It previously allowed professionals to gain advice in a no names capacity.

MASH – Multi-agency safeguarding hub team which identifies risks to vulnerable adults and children. If an immediate response from Children's Social Care is necessary.

NSPCC - National Society for the Prevention of Cruelty to Children. A charitable organisation whose services help children who've been abused, protect children at risk and find the best ways to prevent child abuse from ever happening.

PSHE - Personal, social, health and economic education is an important and necessary part of all pupils' education.

SEN – Special educational needs refers to any student who may find it harder to learn than the majority of children of the same age, or they may have a disability which prevents or hinders them from making use of the educational facilities provided for other children.

SEND - Special educational needs and disabilities refers to any student who may find it harder to learn than the majority of children of the same age, or they may have a disability which prevents or hinders them from making use of the educational facilities provided for other children.

SENDco - Special educational needs and disabilities coordinator is the member of staff within school who coordinates the provision for children with special educational needs or disabilities in schools.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

A clinical commissioning group for an area within the LA

The chief officer of police for a police area in the LA area

5. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities (SEND) (see section 10)

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- LGBTQ+

We are an inclusive school and all policies and provisions in place look at how best to incorporate the needs of all the subgroups within our school and wider community equally into all aspects of school life.

Additionally, it is recognised that students that are absent as well as missing from education are potentially at greater risk of a range of safeguarding concerns. They are discussed and appropriate safeguarding sightings and procedures placed around them as actions from weekly pastoral strategy meetings.

6. Roles and responsibility

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors and is consistent with the procedures of the 3 safeguarding partners for each school. Our policy and procedures also apply to extended school and off-site activities.

6.1 All staff

All staff must read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and re-read this guidance at least annually. All staff will confirm that they have read and understood key documentation, which will include Part 1 and Annex A of Keeping Children Safe in Education, this policy, the school's Code of Conduct, Whistleblowing Policy and Behaviour Policy.

All staff will be aware of:

Our systems which support safeguarding, including the role and identity of the designated safeguarding lead (DSL) and their deputy, and the safeguarding response to children who go missing from education.

The Early Help Assessment (previously known as the Common Assessment Framework) and their role in it, including identifying emerging problems, liaising with the DSL and/or DDSL, and sharing information with other professionals to support early identification and assessment.

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation. How concerns are recorded via Child Protection Online Management System (CPOMS).

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

6.2 The designated safeguarding lead (DSL)

The DSL is a member of the Senior Leadership Team. The DSL for Aylesbury UTC is Sarah Wood, Assistant Principal. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

If it is necessary to contact the DSL out of school hours, this can be done by emailing swood@aylesburyutc.co.uk

When the DSL is absent, the Deputy DSL, will act as cover.

If the DSL and Deputy DSL are not available, Kelly Rudgley, and other DSL trained members of staff will act as cover (for example, during out of hours/out of term activities).

The DSL will be given the time, funding, training, resources and support to:

Provide advice and support to other staff on child welfare and child protection matters.

Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.

Contribute to the assessment of children.

Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, MASH, and/or police), and support staff who make such referrals directly.

The DSL will also keep the principal informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

6.3 The board of governors

The board will review and approve this policy annually.

The board will appoint a board level lead to monitor the effectiveness of this policy in conjunction with the full board.

This is always a different person from the DSL.

The chair of governors may act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

Section 14 has information on how governors are supported to fulfil their role.

6.4 The principal

The principal is responsible for the implementation of this policy at the school, either directly or by delegation to the DSL, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

6.5 The DSL and Safeguarding Officer

The DSL and safeguarding officer is responsible for attending and coordinating meetings with external agencies and actions arising from those meetings for all students who are CP and CIN.

This will be done in consultation with the DSL and where appropriate other members of the wider pastoral team. They will be responsible for appropriately feeding back key outcomes and actions to appropriate staff.

7. Confidentiality

You should note that:

Timely information sharing is essential to effective safeguarding.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

The Data Protection Act (DPA) 2018 and the General Data Protection Regulation do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition. This allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 13, and allegations of abuse against staff in appendix 3.

8. Recognising abuse and taking action

Staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding issue. See Appendix 4 for further information about specific safeguarding issues detailed in this section.

8.1 If a child is suffering or likely to suffer from harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 6.2) as soon as possible if you make a referral directly.

- If staff members have any **concerns** about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Lead (DSL/DDSL) to agree a course of action, although any staff member can make a referral to children's Social Care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Oxfordshire Safeguarding Children Board. <http://www.oscb.org.uk/>
- If anyone other than the DSL makes the referral they should inform the DSL and/or DDSL, as soon as possible.
- If, after a referral the child's situation does not appear to be improving, the DSL/DDSL (or the person who made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

- If Early Help is appropriate, the DSL/DDSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- If Early Help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

Listen to and believe them.

Allow them time to talk freely and do not ask leading questions.

Stay calm and do not show that you are shocked or upset.

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.

8.3 If you discover that FGM has taken place or a child is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should **not** examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL/Deputy DSL, who will report this to the police.

8.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Figure 1 after 8.5 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

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 a strength and needs assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed and recorded on CPOMS.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

8.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and local governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related

8.6 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Any concerns should be immediately passed onto the DSL.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Any concerns should be immediately passed onto the DSL.

8.7 Serious Violent Crime

All staff should be aware of the indicators that may signal that children are at risk from, or involved with, serious violent crime. Such indicators include:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

Any concerns should be immediately passed onto the DSL.

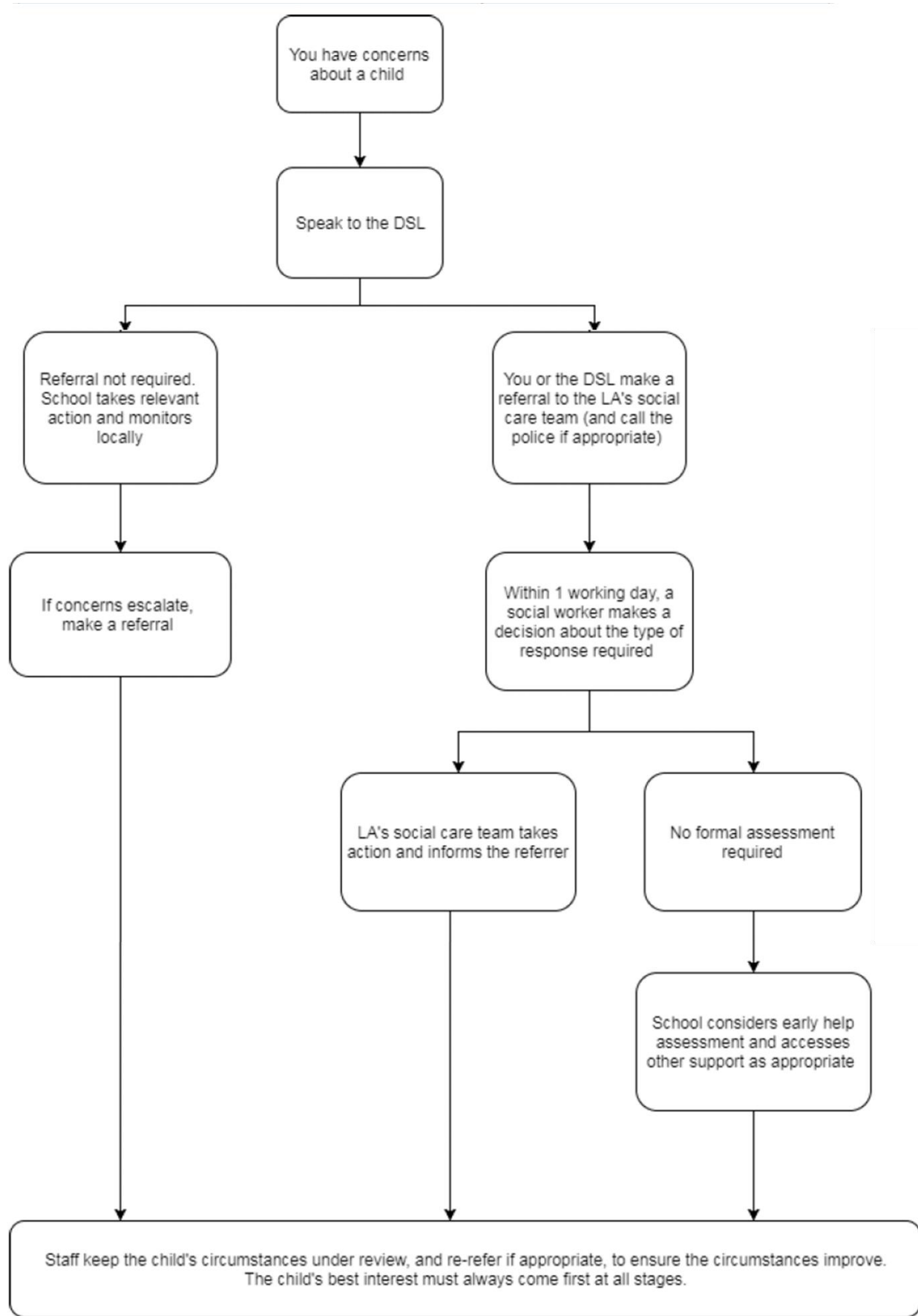
8.8 Domestic abuse

All staff should be aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse directly. However, they may also see, hear, or experience the

effects of abuse at home, and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 8.4 for what to do.)



8.8 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the principal. If the concerns/allegations are about the principal, speak to the chair of the governing body.

The principal/chair of the governing body will then follow the procedures set out in appendix 3, if appropriate.

In addition, if any allegations are made in relation to an individual or organisation using the school premise then the school has responsibility to follow the same allegations procedure as they would with an employee.

8.9 Child on child abuse - Allegations of abuse made against other pupils

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting, or sexually inappropriate pictures or videos (including sexting)
- all staff should reassure victims of abuse that they are being taken seriously and will be supported. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

Sexual harassment can (but is not limited to 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
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- It may include consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially through information given to them in assemblies, tutor time, PSHE and Parent Information Evenings.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Note at all points we aim to explain the law to children – our aim is always in the first instance to try to protect and not criminalise young people.

8.10 Sexting

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.
- You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Following a report of an incident, the DSL will discuss with appropriate school staff. This will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil (s)..
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed).
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

If a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review. They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling 101.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded on CPOMS. The record-keeping arrangements set out in section 13 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE curriculum. More information on the PSHE curriculum, including how parents can opt out, is available on the school website.

8.11 Online abuse and cybercrime

The school regularly educates students and parents about online safety through assemblies, tutor time, PSHE, newsletters, and emails home to parents. There is also a section of the school website that discusses risks and abuse that students are vulnerable to online, as well as supportive links that parents can use at home.

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- Denial of Service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area then it should be reported to the DSL, the DSL or DDSL should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

9. Notifying parents

Where appropriate, schools will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If the school believes that notifying the parents would increase the risk to the child, they will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the school will normally notify the parents of all the children involved.

10. Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

- 1:1 and small group work with key workers (SENDco and Learning Support Staff in M1)
- Learning Support Department drop-ins
- Nurture / learning support staff timetabled onto social time
- Internal and external alternative provision organised and coordinated by M2 staff on an individual case by case basis
- School Counsellor provision
- School Health Nurse provision

11. Children we care for (previously LAC) and post-LAC

This group of students will have a named lead within the school. Their role is in liaising where appropriate with families and virtual schools to ensure the ongoing, personalised support for students in the school who are in care or who have previously been in care.

12. Online filtering, mobile phones and cameras

School-based staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Exceptions to this are senior staff on duty who may use their phones to liaise with reception and senior colleagues to enable them to effectively coordinate and support student welfare and discipline on site, in addition to school-issued two-way radios.

Students are allowed to bring phones and mobile devices into school, however, they are expected to remain off and in bags between the working hours of 8.40 and 3.05 unless a staff member asks for students to use them.

On occasion, staff will take pictures or recordings of pupils on their personal phones or cameras for the purposes of recognition and sharing success via school social media/website. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

This is outlined in more detail through the staff code of conduct.

All staff receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The DSL should take lead responsibility for understanding the filtering and monitoring systems and processes in place.

Current filtering and monitoring in place...

This is in line with the Department for Education's new filtering and monitoring standards (DfE, 2023b).

13. Complaints and concerns about safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

Please refer to our school Complaints Policy.

13.3 Whistle-blowing

All our staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and that such concerns will be taken seriously by the Senior Leadership Team.

Please refer to our trust Whistleblowing Policy for information on how to report concerns.

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 are open to them:

- General guidance can be found at - Advice on Whistleblowing <https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools>
- The NSPCC Whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file within the stipulated 5 school days. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks. Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

14.1 Local record-keeping arrangements

The Designated Staff for child protection are responsible for ensuring that the necessary paperwork is completed and sent to the relevant people. All safeguarding concerns raised since September 2019 are recorded and held securely in

the school's CPOMS portal, as discussed and agreed with the LADO team. The chronology around a student is built automatically within the CPOMS program. This ensures that records are a coherent factual record of concerns.

Concerns, records and documentation raise prior to September 2019 are securely held in hard copy or on the pastoral portal, as per statutory guidance. We are working to transfer these documents onto the CPOMS document vault for individuals.

15. Training

15.1 All staff

All staff members will undertake generalist safeguarding and child protection training to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This generalist training will be repeated at least every three years for all staff and will be regularly updated in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and Deputy DSL

The DSL and Deputy DSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Governors

Governor safeguarding training – Governors should receive safeguarding training at point of induction, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

This training will be offered every year, and will need to be refreshed at least every three years to remain valid through generalist training provided by the DSL or DDSL.

In addition at least one governor must be trained to DSL level, this is likely but does not have to be limited to, the safeguarding governor.

Through governor meetings safeguarding will be a standing agenda item, and governors will routinely be given scenarios and case studies to greater enhance their understanding of safeguarding procedures in the school.

15.4 Recruitment – Interview panels – Safer recruitment

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

The pre-recruitment process will also include online search checks for applicants in line with guidance. This information is held on the school's SCR for staff employed since the guidance was introduced.

16. Monitoring arrangements

This policy will be reviewed annually by the headteacher, in conjunction with the DSL. At every review, it will be reviewed and approved by the governing body.

17. Other policies

Other useful policies and procedures to be aware of:

Behaviour

Complaints (trust policy)

Whistle-blowing (trust policy)

Health and safety

Attendance

Equality, information and objectives

Sex and Relationship Education

Privacy notices (trust policy)
Computer use
Remote learning
Recruitment
Social media policy (trust policy)

18. Sixth Form

This policy covers the safeguarding procedures that are in place for all students at Aylesbury UTC, this includes those who attend our Sixth Form. However, below are some additional arrangements in place for Sixth Form students.

Any safeguarding concerns directed to the Head of Department will be passed on, to the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL).

Procedures for 16-18 Year Olds

Head of Department, the DSL, or nominated staff, will inform parents/carers, or first point of contact, and/or the police (as appropriate to circumstance) should the student, regardless of age, be in immediate danger to themselves or others.

If a disclosure is made and the student is under 18 years of age, the Head of Department, the DSL, or nominated staff will inform parents. If a serious disclosure is made, the Head of Department, the DSL, or nominated staff, may notify parents/carers but may also refer straight to MASH team/Police for students under 18.

If disclosure is made by a student and there is any risk to student by parent/carers, the Head of Department, the DSL, or nominated staff, will contact MASH team/Police without notifying parents/carers.

Should there be any Police involvement, the Head of Department, the DSL, or nominated staff, will inform parents if the student is under 18 years of age.

Should there be any Police involvement and the student is over 18 years of age, the Head of Department, the DSL, or nominated staff, will inform parents if police are involved with a school related issue but will not, as appropriate, discuss specific details with parents/carers (unless to do so would fall under the duty of care that school has to the student).

The Head of Department, the DSL, or nominated staff, will make no names consultations with our LCSS/Local Assessment Teams/MASH team on specific concerns arising but should they then ask for a name they will disclose those details and it will become a referral

The Head of Department, the DSL, or nominated staff, may refer to LADO with specific concerns to seek advice about how best to respond for students aged 18 or over

Additional Safeguarding Measures in Place for Year 12 and 13 Students

Identifying students at risk:

Students with CP files leaving in or at end of Year 12 or 13 to go to study at another institution, where destination is known, institution contacted and files sent to named DSL via recorded delivery. DSL also alerted by phone that file being sent. CAMHS alerted if applicable.

Keeping students safe:

All Sixth Form students are expected to be on site during the school day, unless they have been told they are allowed to arrive late or go home early. Students should swipe in and/or out should they not be in for the whole school day.

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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 from 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 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse, previously child on child) in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, 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.

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the trust'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.

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.
- 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.
- CV's are not acceptable on own without full application form

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

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.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that 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.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the trust 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.

Trainee/student teachers

We will ensure that all necessary checks are carried out such as DBS checks. Where full DBS checks are not complete trainee/student teachers will be supervised at all times.

Volunteers

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

Governors

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 chair of the board will have their DBS check countersigned by the secretary of state.

All governors and members 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](#)) where local governors have retained or been delegated any management responsibilities
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

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.

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.

Appendix 3: allegations of abuse made against staff

This section of 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 on trust premises. 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.

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.

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

- Redeployment within the school 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 so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative site or other work for the school

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a 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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or potentially the chair of the local governing body where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. 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 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).
- 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 children at the trust is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the 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 trust 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 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 designated officer to initiate the appropriate action on the premises 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 other support as appropriate (trade union representative/school counsellor).
- 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.

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.

Specific actions

Action following a criminal investigation or prosecution

The case manager 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.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the trust'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.

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 on the trust premises.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, 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.

Confidentiality

The school 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

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.

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.

Learning lessons

All allegations against staff should be used to determine if any lessons can be learned as well as improvements made. Specifically 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 school'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

Low level concerns

In circumstances when the concerns are of a low level and do not meet the threshold for outside agency involvement they will be dealt with internally by the direct and SLT line manager of the member of staff.

Appendix 4: specific safeguarding issues

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators can be found in the KCSIE document.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Further information about CSE including definitions and indicators is included in the KCSIE document.

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

Child on child abuse

All staff should be aware that children can abuse other children (often referred to as child on child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school’s or college’s policy and procedures with regard to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office’s [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare.

The DSL and deputy DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children’s social care.

So-called ‘honour-based’ violence (including FGM and forced marriage)

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmfu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 8.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Missing pupils

If a child goes missing, we will seek to ensure the child is found and returned to effective supervision as soon as possible. If there is suspicion or confirmation that a child is missing during the school day, we will:

- Carry out a physical check of the classroom/teaching space where the child should be
- Contact parents/carers to advise them if the child is not located
- Carry out a physical check of the school (by a member of senior staff on duty) and ensure parents/carers are kept informed of any developments
- If the school is unable to contact parents/carers or any secondary contacts the school has for the child within a reasonable timeframe, we will report the child missing to the police on 101 and inform parents/carers this has happened as soon as possible