



**Alma  
Primary**  
עולם חסד יבנה  
A world built on kindness

# Alma Primary Child Protection and Safeguarding Policy

## Policy no. 48

Responsibility: *Marc Shoffren*  
GB Body responsible: *Safeguarding SubCommittee*  
Last review date: *April 2023*  
Next review date: *Spring 2024*

### Contents

|   |         |
|---|---------|
| 1. Introduction: Safeguarding Statement of Intent             | Page 1  |
| 2. Definitions and Legal Framework                            | Page 3  |
| 3. Safeguarding Roles & Responsibilities                      | Page 6  |
| 4. Forms of Abuse   | Page 12 |
| 5. Contextual Safeguarding & Radicalisation                   | Page 19 |
| 6. Attendance, SEND and Alternative Provision                 | Page 23 |
| 7. Managing Referrals   | Page 26 |
| 8. Concerns and Allegations Involving Staff or Other Children | Page 27 |
| 9. Safeguarding in the Curriculum and Supporting Children     | Page 32 |
| 10. Reporting and Confidentiality                             | Page 33 |
| 11. Working with Parents and Carers                           | Page 36 |
| 12. Mobile Devices and Up-Skirting                            | Page 37 |
| 13. Organisational management of Safeguarding                 | Page 38 |
| 14. Staff training and Policy Monitoring                      | Page 40 |
| Appendix 1: COVID-19 Safeguarding arrangements                | Page 42 |

### Policy Development New – amendment/change

| Change  | By       | Date       |
|---|----------|------------|
| <i>Revised in line with changes in practice</i>   | MJS      | March 2015 |
| <i>Included disqualification by association, CSE &amp; FGM</i>  | MJS      | May 2015   |
| <i>Ref to Barnet SCB Multi-agency escalation policy</i>   | MJS      | May 2015   |
| Additional sections on County Lines, safe practice & child on child abuse + changes to terms DSL, BSCP etc. | SR & MJS | May 2019   |
| Significant revision in light of KCSIE 2020   | SR & MJS | Sept 2020  |
| Significant revision in light of KCSIE 2021   | SR       | March 2022 |
| Change to child-on-child and addition of CPOMS  | MJS      | Jan 2023   |
| Clarification of first aid and good practice reviews.   | MJS & ET | April 2023 |

### 1. INTRODUCTION: Safeguarding Statement of Intent

Alma Primary is committed to safeguarding and promoting the welfare, both physical and emotional, of every child both inside and outside of the school premises, providing a safe and secure environment for children, staff and visitors, and promoting a climate where children and adults feel confident about sharing any concerns which they may have about their own safety, or the well-being of others. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of children is at the forefront of all action taken. Safeguarding is defined as protecting children from maltreatment, preventing impairment of health and/or development, ensuring that children grow up in the provision of safe and effective care and optimising children's life chances.

This policy applies to all staff, governors and volunteers working in the Alma Primary. The purpose of this policy is to inform staff, parents, volunteers and governors about the school's responsibilities for safeguarding children, as well as to enable everyone to have a clear understanding of how these responsibilities should be carried out. School staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.

The purposes of this policy are to:

- Ensure that Alma Primary has a robust procedure to protect children from abuse, including child sexual exploitation and female genital mutilation;
- To support a child's development in ways that will foster security, confidence and independence by establishing and maintaining an environment where children feel secure, are encouraged to talk, and are listened to when they have a worry or concern;
- To include opportunities in the curriculum, including digital-safety, for children to develop the skills they need to recognise and stay safe from abuse;
- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and well-being of a child;
- Ensure children know that there are adults in the school whom they can approach if they are worried;
- Identify children who are suffering or are like to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe both at home and in our school;
- Ensure adults understand how to address concerns in school and to escalate issues which they do not believe have been addressed with sufficient rigor;
- To provide a systematic means of monitoring children known or thought to be at risk of harm, ensuring that children who have been abused will be supported in line with a child protection plan, where deemed necessary.
- To emphasise the need for good levels of communication between all members of staff.

This policy sets out a clear and consistent framework for delivering this commitment, in line with safeguarding legislation and statutory guidance. It is applicable to all on and off site

## Alma Primary Safeguarding Policy

activities undertaken by the children whilst they are the responsibility of Alma Primary.

A safe and secure environment will be achieved through:

- Creating a culture of safer recruitment, adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching children how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any child that has been subject to abuse.
- Ensuring that members of the governing body, the headteacher and all staff members understand their responsibilities under safeguarding legislation and statutory guidance, and are alert to the signs of child abuse as well as knowing to refer concerns to the DSL.
- Ensuring that the headteacher and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Ensuring that all school staff, volunteers, governors and peripatetic staff have received appropriate and current safeguarding training, which is refreshed every three years, or more frequently if needed.
- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children know where there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include in the curriculum opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

This policy forms part of a suite of documents and policies that relate to the safeguarding responsibilities of the school.

In particular this policy should be read in conjunction with the Safer Recruitment Policy, Behaviour Policy, Preventing Bullying Policy, Digital-Safety Policy, Special Educational Needs Policy, School visits and journeys, First aid, Health and Safety, Sex and Relationships Education and Equal Opportunities policies. Staff should also ensure that they are familiar with Keeping Children Safe in Education 2020.

We work in partnership and share responsibility with other agencies such as Social Care, Police and Health Professionals, to provide effective working relationships that promote safeguarding of children.

Alma Primary's DSL is Marc Shoffren, the school Headteacher. In his absence child protection matters will be dealt with by one of the deputy DSLs. Details of the current team, including the Safeguarding Governor, are displayed on signage around the school.

### 2. DEFINITIONS and LEGAL FRAMEWORK

#### Safeguarding and Child Protection Definitions

The terms “children” and “child” refer to anyone under the age of 18.

For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

- Protecting children from maltreatment.
- Preventing the impairment of children’s mental and physical 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.

For the purposes of this policy, the term “harmful sexual behaviour” includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’ (2018), and for the purposes of this policy, the term “sexual harassment” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term “sexual violence” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

For the purposes of this policy, “up-skirting” refers to the act of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks (with or without clothing). Despite the name, anyone (including both children and teachers), and any gender, can be a victim of up-skirting.

The term “teaching role” is defined as planning and preparing lessons and courses for children; delivering lessons to children; assessing the development, progress and attainment of children; and reporting on the development, progress and attainment of children. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction

and supervision.

For the purpose of this policy, “child on child” abuse is defined as abuse between children. This can include, but is not limited to the following:

- Abuse within intimate partner relationships
- Bullying (including cyberbullying)
- Sexual violence and sexual harassment
- Physical abuse and physical harm
- Sexting
- Initiation/hazing-type violence and rituals

### **Legal Framework**

This policy has been created with due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

#### ***Legislation***

- Children Act 1989
- Children Act 2004
- The Children and Families Act 2014
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- [Schools providing education to children under the age of eight only] The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019

#### ***Statutory guidance***

- HM Government (2013) ‘Multi-agency practice guidelines: Handling cases of Forced Marriage’
- DfE (2018) ‘Working Together to Safeguard Children’
- DfE (2015) ‘The Prevent duty’
- DfE (2022) ‘Keeping children safe in education’
- DfE (2018) ‘Disqualification under the Childcare Act 2006’
- DfE (2021) ‘Relationships and sex education (RSE) and health education’

#### ***Non-statutory guidance***

- DfE (2015) ‘What to do if you’re worried a child is being abused’
- DfE (2016) ‘Behaviour and discipline in schools’
- DfE (2017) ‘Child sexual exploitation’
- DfE (2017) ‘Preventing and tackling bullying’

## Alma Primary Safeguarding Policy

- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes'
- DfE (2020) 'Promoting children and young people's mental health and wellbeing'
- UK Public General Acts (2021) 'Domestic and Abuse Act'

Keeping Children Safe in Education 2022 states that 'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.'

Each child's welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse. We also recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. In some cases, this may mean that their behaviour may be challenging. We will always take a considered and sensitive approach in order that we can support all of our students.

Safeguarding, which includes child-protection, is never a 'stand-alone' issue. It is an embedded element of school practice which relates to many aspects of school life including:

- Curriculum
- Digital-Safety
- Preventing bullying
- Attendance
- Behaviour management
- Safe recruitment and selection
- Staff Conduct
- Managing allegations against staff
- Whistle blowing
- Health and safety
- Educational/off-site visits

### Safe Practice

Alma Primary complies with the current Safe Practice guidance.

Safe working practice ensures that students are safe and that all staff:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Work in an open and transparent way;
- Record any incidents or decisions made;
- Work with other colleagues where possible in situations open to question;

- Discuss and/or take advice from the School Leadership Team over any incident which may give rise to concern;
- Apply the same professional standards regardless of gender or sexuality;
- Be aware of confidentiality practice;
- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

For the reasons explained in this policy, the school will always take allegations of harm or abuse seriously, and will follow up on disclosures by children, as well information shared by all adults in the school community that relate to children's safeguarding and wellbeing.

### 3. SAFEGUARDING ROLES and RESPONSIBILITIES

#### The Governing Body

The Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment. In particular, the Governing Body must:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation;
- Ensure that the policies, procedures and training in the school are effective and comply with the law at all times;
- Ensure that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children 2018';
- Ensure that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures established by the Barnet Safeguarding Children Partnership (BSCP);
- Comply with its obligations under section 14B of the Children's Act 2004 to supply BSCP with information to fulfil its functions;
- Ensure that staff members have due regard to relevant data protection principles that allow them to share (and withhold) personal information;
- Ensure that a member of the governing body is nominated to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or a governor;
- Ensure that there is an effective Child Protection Policy in place together with a Staff Behaviour Policy/Code of Conduct;
- Appoint a member of staff from the school leadership team (SLT) to the role of DSL (Designated Safeguarding Lead) as an explicit part of the role-holder's job description;
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s);
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing body itself, the SLT and DSL;
- Ensure that all children are taught about safeguarding, including protection against



dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum;

- Ensure that staff members are appropriately trained to support children to be themselves at school, e.g. if they are LGBTQ+;
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in children, including clear routes to escalate concerns and clear referral and accountability systems;
- Guarantee that volunteers are appropriately supervised;
- Prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised;
- Ensure that at least one person on any appointment panel has undertaken safer recruitment training;
- Ensure that there are procedures in place to handle allegations against members of staff or volunteers;
- Ensure that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned;
- Ensure that there are procedures in place to handle allegations against other children;
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse;
- Ensure that the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback;
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children and staff;
- Appoint a designated teacher to promote the educational achievement of 'Looked After Children' and to ensure that this person has undergone appropriate training;
- Establish an early help procedure and ensure all staff understand the procedure and their role in it;
- Ensure that staff members have the skills, knowledge and understanding necessary to keeping 'looked after children' safe, particularly with regard to the child's legal status, contact details and care arrangements;
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities;
- Put in place appropriate safeguarding responses to children who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation and prevent the risks of their disappearance in future;



## **Alma Primary Safeguarding Policy**

- Ensure that safeguarding policies and procedures are monitored and reviewed annually and information provided to the local authority on request, in regard to the way the above duties have been discharged;
- Ensure that all members of the governing body have been subject to an enhanced DBS check;
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

### **The Headteacher**

The Headteacher has responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment on a day-to-day basis. In particular the Headteacher must:

- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties;
- Ensure that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members;
- Provide staff, upon induction, with relevant documents including the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, Behavioural Policy, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.

### **The Designated Safeguarding Lead (DSL)**

It is the role of the Designated Safeguarding Lead for Child Protection to:

- Understand and keep up-to-date with local safeguarding arrangements;
- Act as the main point of contact with the three safeguarding partners and the child death review partner;
- Make the necessary child protection referrals to appropriate agencies;
- Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) guidance;
- Decide upon the appropriate level of response to specific concerns about a child e.g. discuss with parents, offer an assessment under the Common Assessment Framework (CAF/e-CAF) or refer to the Multi Agency Safeguarding Hub (MASH);
- Refer all cases of suspected abuse to the local authority children's social care, the local authority designated officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed;
- Liaise with the Headteacher (if the Headteacher is not DSL) to inform him/her of safeguarding issues, especially on-going enquiries under section 47 of the Children's Act 1989 and police investigations;
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes;
- Act as a source of support, advice and expertise to staff members on matters of safeguarding and when deciding whether to make a referral by liaising with relevant

agencies;

- Understand the assessment process for providing early help and intervention, keeping cases of early help under constant review and referring them to the CSCS if the situation does not appear to be improving;
- Obtain access to resources and attend any relevant or refresher training courses, ensuring that he/she receives refresher training at two yearly intervals to keep his or her knowledge and skills up to date;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure that new staff, peripatetic staff, governors and volunteers receive an induction to safeguarding children within 14 working days of commencement of their role, including being aware of the Barnet Child Protection and Safeguarding Children Procedures;
- Ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures, especially new and part-time staff members;
- Be alert to the specific needs of children in need, including those with Special Educational Needs and/or Disabilities and young carers;
- Keep detailed, accurate and secure records of concerns and referrals;
- Secure access to resources and attend any relevant training courses;
- Encourage among all staff members, a culture of listening to children and taking account of their wishes and feelings; in any measures the school may put in place to protect them;
- Ensure the school's Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this duty;
- Ensure the school's Safeguarding Policy is available publicly and parents are aware of the fact that referrals regarding suspected abuse or neglect may be made and the role of the school in this;
- Ensure the best educational outcomes by identifying at-risk children to the school and its staff, so that the relevant personnel understand each child's educational and welfare needs;
- Support teaching staff to identify the challenges that at-risk children may face and the additional academic support and adjustments they can make to support these children;
- Link with the local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding;
- Liaise and work with social care teams over suspected cases of child abuse;
- Ensure that accurate safeguarding records relating to individual children are kept separate from the academic file in a secure place, marked 'Strictly Confidential' and are passed securely should the child transfer to a new provision;

## Alma Primary Safeguarding Policy

- Submit reports to relevant external agencies, as well as to the Governing Body, ensuring the school's attendance at child protection conferences and contribute to decision making and delivery of actions planned to safeguard the child
- Ensure that the school effectively monitors children about whom there are concerns, including notifying Barnet social care when there is an unexplained absence of more than two days for a child who is the subject of a child protection plan;
- Provide guidance to parents, children and staff about obtaining suitable support;
- Be available at all times (as part of a team) during school hours to discuss any safeguarding concerns. This may be via electronic means, such as on the phone or using video conferencing software;
- Hold the details of the LA personal advisor and liaise with them as necessary.

The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. This responsibility is delegated to the school's Inclusion Leader.

### All School Staff

All school staff have a responsibility for safeguarding children. If any member of staff is concerned about a child s/he must inform the Designated Safeguarding Lead.

At Alma Primary all school staff must:

- Provide a safe environment in which children can learn, ensuring awareness of the signs of abuse and neglect;
- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties;
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse;
- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Identify children who may be in need of extra help or who are suffering, or likely to suffer, significant harm;
- Be aware of the early help process and understand their role in it;
- Act as the lead professional in undertaking an early help assessment, where required;
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments;
- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data;
- Ensure that a referral is made to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child;
- Be aware of and understand the procedure to follow in the event that a child confides

## Alma Primary Safeguarding Policy

they are being abused or neglected;

- Support social workers to take decisions about individual children, in collaboration with the Designated Safeguarding Lead;
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child;
- Follow the school's procedure for, and approach to, preventing radicalisation;
- Challenge senior leaders over any safeguarding concerns, where necessary;
- Work with other services, taking appropriate action as required.

In addition, all staff will comply with the current Safe Practice guidance. Safe working practice ensures that students are safe and that all staff:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Ensure that they are familiar with this policy and related school policies, as well as guidance available from the Barnet Safeguarding Children Partnership;
- Discuss and/or take advice from the Designate Safeguarding Lead over any incident which may give rise to concern;
- Work in an open and transparent way;
- Work with other colleagues where possible, in situations which may be open to question;
- Record any incidents or decisions made;
- Apply the same professional standards regardless of gender or sexuality;
- Be aware of confidentiality practice;
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

### Inter-agency working

Alma Primary contributes to inter-agency working as part of its statutory duty. Staff at Alma are aware of and will follow the local safeguarding arrangements, including:

- The school will work with Children's Social Care Services (CSCS), the police, health services and other services to protect the welfare of its children, through the early help process and by contributing to inter-agency plans to provide additional support;
- Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment;
- The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet children's needs and identify any need for early help;
- Staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to

- do so would result in the child being placed at risk of harm;
- Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children;
- If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL;
- The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

### 4. FORMS of ABUSE

Abuse is the maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. A child/children may be abused by an adult or adults, or by another child or children. Child abuse can take a variety of forms and it is important that all staff and volunteers are aware of the main forms of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

All staff, especially the DSL and their deputies, must be aware:

- That neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another;
- That children can be at risk of abuse or exploitation in situations outside their families (extra-familial harms);
- Of the indicators of abuse and the appropriate action to take following a child being identified as at potential risk of abuse or neglect;
- Of the indicators of child-on-child abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting;
- Of the necessary procedures to follow to prevent child-on-child abuse, as outlined in section 30 of this policy.
- Of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put children in danger.
- Of the effects of a child witnessing an incident of abuse, such as witnessing domestic violence at home.
- That when identifying children at risk of potential harm, they need to look out for a number of indicators including, but not limited to, the following:
  - Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
  - Lack of concentration and acting withdrawn
  - Knowledge ahead of their age, e.g. sexual knowledge.
  - Use of explicit language
  - Fear of abandonment
  - Depression and low self-esteem

- That in an abusive relationship the child may:
  - Appear frightened of the parent/s or other household members e.g. siblings or others outside of the home
  - Act in a way that is inappropriate to her/his age and development (full account needs to be taken of different patterns of development and different ethnic groups)
  - Display insufficient sense of 'boundaries', lack stranger awareness
  - Appear wary of adults and display 'frozen watchfulness'

### Types of abuse and neglect

Abuse is a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet. The main types of abuse are:

**Physical abuse**: A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse**: A form of abuse that involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

**Sexual abuse**: A form of abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

**Neglect**: A form of abuse that involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

In addition to these main forms of abuse, there are specific manifestations of abuse, which include:

**FGM**: For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. FGM is considered a form of abuse in the UK and is illegal.

All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care

and/or the police.

Teaching staff are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

There are a range of potential indicators that a child may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the child.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the child may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine children, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community,



## Alma Primary Safeguarding Policy

alongside forced marriage and breast ironing.

All forms of HBA are forms of abuse and will be treated and escalated as such.

Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

**Forced marriage:** For the purpose of this policy, a “forced marriage” is defined as a marriage that is 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 the marriage. Forced marriage is classed as a crime in the UK.

As part of HBA, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

**Child sexual exploitation (CSE):** For the purpose of this policy, “child sexual exploitation” is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

### **A. Identifying cases**

School staff members will be aware of and look for the key indicators of CSE; these are as follows:

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant

*Other indicators outlined below may also be signs that a child is a victim of CSE*

### ***B. Referring cases***

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

### ***C. Support***

The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

***Child criminal exploitation (CCE):*** For the purpose of this policy, “child criminal exploitation” is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

### ***Identifying cases***

School staff will be aware of the following indicators that a child is the victim of CCE:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part

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

In address potential cases that involve mental health issues, staff will:

- Not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.
- Be encouraged to identify children whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one
- Access a range of advice to help them identify children in need of additional mental health support, including working with external agencies.

Staff who have a mental health concern about a child that is also a safeguarding concern will act in line with this policy and speak to the DSL or a deputy.

***Homelessness:*** The DSL and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

**County lines:** For the purpose of this policy, “County lines” refers to organised criminal networks or gangs exploiting children to move drugs and money into one or more areas (within the UK). Drugs and money may also be stored by children for the purpose of criminal activity.

Staff will be made aware of children with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a child may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Indicators that a child may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Suspicion of physical assault / unexplained injuries;
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results/performance
- Gang association
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

**Serious violence:** Through training, all staff will be made aware of the indicators which may signal a child is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance

## **Alma Primary Safeguarding Policy**

- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions
- Associations with criminal networks or gangs and at risk of criminal exploitation

Staff will be made aware of some of the most significant risk factors that could increase a child's vulnerability to becoming involved in serious violent crime. These risk factors include, but are not limited to, the following:

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour
- Frequently absent or excluded from school
- Having experienced child maltreatment

Keeping Children Safe in Education also notes that gender, particularly being male, can increase the likelihood of involvement in serious violence. Staff members who suspect a child may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

### **Responding to Concerns about a Child**

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy. All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined below. Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter. If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the child. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the child. If early help is appropriate, the case will be kept under constant review. If the child's situation does not improve, a referral will be considered.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in a locked cabinet in the Headteacher's office.

If a child is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a child has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the child's wishes are always taken into account, and that there are systems available for children to provide feedback and express their views.

When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the child feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

### **Accessing Early help**

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any child may benefit from early help, but in particular staff will be alert to the potential need for early help for children who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation. All staff will be made aware of the local early help process and understand their role in it. The DSL will take the lead where early help is appropriate.

## **5. CONTEXTUAL SAFEGUARDING and RADICALISATION**

### **Contextual safeguarding**

Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is referred to as contextual safeguarding. Assessment of children's behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

### Preventing radicalisation

For the purpose of this policy, we have used the following definitions:

- “**Radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies
- “**Extremism**” refers to the vocal or active opposition to fundamental British values, e.g. individual liberty and the rule of law
- “**Terrorism**” refers to an action that endangers or causes serious violence to a person or people, property, or electronic system, which is designed to influence the government, intimidate the public, or advance a cause.

Protecting children from the risk of radicalisation is part of the school’s wider safeguarding duties. The school will actively assess the risk of children being drawn into terrorism. In support of this approach, staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.

Staff will use their professional judgement to identify children who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child’s parents, unless the school has reason to believe that the child would be placed at risk as a result.

### Training

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

### *Risk indicators of vulnerable children*

*Indicators of an identity crisis include the following:*

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

*Indicators of a personal crisis include the following:*

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging
- Indicators of vulnerability through personal circumstances includes the following:
  - Migration
  - Local community tensions

- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

*Indicators of vulnerability through unmet aspirations include the following:*

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

### ***Making a judgement***

When making a judgement, staff will ask themselves the following questions:

- Does the child have access to extremist influences?
- Does the child access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using video calling e.g. Skype or Zoom?)
- Is there a reason to believe that the child has been, or is likely to be, involved with extremist organisations?
- Is the child known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the child sympathise with or support illegal/illicit groups?
- Does the child support groups with links to extremist activity?
- Has the child encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the child?
- Has there been a significant shift in the child's outward appearance that suggests a new social, political or religious influence?
- Has the child come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the child vocally support terrorist attacks, either verbally or in their written work?
- Has the child witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the child travelled for extended periods of time to international locations?
- Has the child employed any methods to disguise their identity?
- Does the child have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child display a lack of affinity or understanding for others?
- Is the child the victim of social isolation?
- Does the child demonstrate a simplistic or flawed understanding of religion or politics?
- Is the child a foreign national or refugee, or awaiting a decision on their/their family's



immigration status?

- Does the child have insecure, conflicted or absent family relationships?
- Has the child experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the child's life has extremist views or sympathies?

Critical indicators include where the child is:

- In contact with extremist recruiters;
- Articulating support for extremist causes or leaders;
- Accessing extremist websites;
- Possessing extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining extremist organisations;
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

In order to manage access to potentially extremist influences, the school will put in place a visitor policy (including guest speakers) which will prevent speakers who may promote extremist views from using the school premises.

### Channel programme

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable child is at risk of being involved in terrorist activities.

In cases where the school believes a child is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme. The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to

CSCS. The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

### **Developing children's resilience**

Alma Primary understands the importance of developing children's resilience in order to enable them to think independently, question and act with moral integrity. To promote this the school will:

- Provide a safe environment for debating controversial issues;
- Promote fundamental British values, alongside children's spiritual, moral, social and cultural development;
- Allow children time to explore sensitive and controversial issues;
- Provide children with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing;
- Equip children to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments;
- Teach children about how democracy, government and law making/enforcement occur;
- Teach children about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

### **Resources**

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The [Educate Against Hate](#) website

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

Children with a family member in prison will be offered pastoral support as necessary.

They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

### **Children required to give evidence in court**

Children required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Children will also be provided with the booklet '[Going to Court](#)' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

### 6. ATTENDANCE, SEND and ALTERNATIVE PROVISION

#### Children Missing from Education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor children that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures.

In normal circumstances (see Covid-19 appendix for exceptions) the school will inform the LA of any child who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

#### *Admissions register*

Children are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the child will first be attending. The school will notify the LA within five days of when a child's name is added to the admissions register. The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

Three emergency contact details will be held for each child where possible.

Staff will monitor children who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the child will live;
- The new address;
- The date from when the child will live at that address.

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school;
- The date on which the child first attended, or is due to attend, that school.

Where a child moves to a new school, the school will use a secure internet system to securely transfer children's data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any child who is going to be deleted from the admission register, in accordance with the Education (Child Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education;
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises;
- Have been certified by the school's medical officer as unlikely to be in a fit state of

health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the child continuing to attend school after ceasing to be of compulsory school age;

- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period;
- Have been permanently excluded.

The school will also remove a child from the admissions register where the school and LA has been unable to establish the child's whereabouts after making reasonable enquiries into their attendance. If a child is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the child;
- The full name and address of any parent with whom the child lives;
- At least one telephone number of the parent with whom the child lives;
- The full name and address of the parent with whom the child is going to live, and the date that the child will start living there, if applicable;
- The name of the child's new school and the child's expected start date there, if applicable;
- The grounds for removal from the admissions register under regulation 8 of the Education (Child Registration) (England) Regulations 2006 (as amended).

The school will work with the LA to establish methods of making returns for children back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information including safeguarding concerns.

### Children with SEND

The school recognises that children with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of children.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the child's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability;
- Children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs;
- Communication barriers may exist, as well as difficulties in overcoming these barriers
- When reporting concerns or making referrals for children with SEND, the above factors will always be taken into consideration.

When managing a safeguarding issue relating to a child with SEND, the DSL will liaise with the school's SENCO, as well as the child's family where appropriate, to ensure that the child's needs are effectively met.

### Alternative provision

When placing a child with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. The school will remain responsible for a child's welfare during their time at an alternative provider.

### Private fostering

Where the school becomes aware of a child being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

## 7. MANAGING REFERRALS

All staff members, in particular the DSL, will be aware of the arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. If a child discloses that he or she has been abused, the member of staff / volunteer hearing the disclosure will follow the school's referral process, ensuring that they:

- Listen to what is being said without displaying shock or disbelief;
- Accept what is being said;
- Allow the child to talk freely;
- Reassure the child, but not make promises which it might not be possible to keep;
- Not promise confidentiality – it might be necessary to refer to the MASH;
- Reassure him or her that what has happened is not his or her fault;
- Stress that it was the right thing to tell;
- Listen, only asking questions when necessary to clarify;
- Not criticise the alleged perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record (see Record Keeping);
- Pass the information to the Designated Safeguarding Lead without delay.

In the event that a member of staff receives a disclosure from a child or notices something which gives rise to concern, the member of staff must record information regarding the concerns on the same day. **Any member of staff, governor or volunteer can make a referral.** The recording must be a clear, precise, factual account of the observations which is signed and dated. See the Alma Primary recording sheet for safeguarding concerns, below.

When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so. The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a child has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made.

Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

**The school will not wait for the start or outcome of an investigation before protecting the victim and other children: this applies to criminal investigations as well as those made by CSCS.**

Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the child is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the child will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the child or others at potential risk of harm.

The school will work closely with parents to ensure that the child, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

### **8. CONCERNS and ALLEGATIONS RELATING TO STAFF or OTHER CHILDREN**

An allegation is any information which indicates that a member of staff, volunteer or child may have:

- Behaved in a way that has, or may have harmed a child or an adult;
- Possibly committed a criminal offence against/related to a child or adult;
- Behaved toward a child or an adult in a way which indicates s/he is unsuitable to work with children.

This applies to any child the member of staff/volunteer has contact with in the personal, professional or community life. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification, it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the headteacher. If the concern is with regards to the headteacher, it will be referred to the Chair of Governors. Contact details for the Chair of Governors are displayed in the staff room.

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the school's

Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

### Dealing with allegations of abuse against staff

All allegations against staff, supply staff and volunteers, will be dealt with in line with the school's policy on Managing Allegations of Abuse Against Staff, a copy of which will be provided to, and understood by, all staff. For the purpose of this policy, the "harms test" refers to a situation where a person would pose a risk of harm if they continued to work in regular or close contact with children in their present position, or in any capacity.

The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter. The Headteacher will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the MASH, in consultation with the BSCP Designated Officer (LADO).

When using an agency to access supply staff, the school will inform them of its processes for managing allegations, including any updates to the relevant policies, and liaise with the agency's human resources manager/provider where necessary.

When an allegation is made, an investigation will be carried out to gather enough evidence to establish whether it has a foundation, and the school will ensure there is sufficient information to meet the [DBS referral criteria](#).

If it is decided that the allegation meets the threshold for further action through the LA Inter-agency Child Protection and Safeguarding Children Procedures, the Headteacher must immediately make a referral. If it is decided that the allegation does not meet the threshold for referral, the Head Teacher and LADO will consider the appropriate course of action, e.g. joint evaluation meeting, internal investigation. The Headteacher should, as soon as possible, following briefing from the LADO inform the subject of the allegation.

On conclusion of a case, where an individual is removed from regulated activity – this could be due to suspension, redeployment to work that is not in regulated activity, dismissal or resignation – the school will refer the case to the DBS as soon as possible.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSCS.

The school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.



### Allegations of abuse against other children (child-on-child abuse)

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

- Bullying (on and offline including prejudice and discriminatory based bullying)
- Abuse in intimate personal relationships between children
- Physical abuse, such as hitting, kicking, shaking, biting and hair pulling. This may also include an online element, which threatens, encourages or facilitates physical abuse.
- Sexual violence such as rape, assault by penetration and sexual assault. This may also include an online element which threatens, encourages or facilitates sexual violence.
  - **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
  - **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
  - **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment.
- 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
- upskirting, to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- 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).

### Awareness

In order to maintain an environment which prevents and addresses abuse, the Alma Primary safeguarding team work to ensure:

- All staff are made aware that children of any age and sex are capable of abusing their peers and will not tolerate abuse as “banter” or “part of growing up”.
- All staff are made aware that child-on-child abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff are made aware that child-on-child abuse violates a child’s dignity and makes

them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment

- All staff are made aware of the heightened vulnerability of children with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the child's SEND and will always explore indicators further.
- All staff are made aware that LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children. The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
- Children will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

It is also important that all school staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem or made to feel ashamed, by reporting abuse, sexual violence or sexual harassment.

### *Harmful Sexual Behaviour*

The term “**harmful sexual behaviour**” is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

### *A preventative approach*

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate children about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons (see Safeguarding education section, below). ***Support available if a child has been harmed, is in immediate danger or at risk of harm***

If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be

made to CSCS. Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

### ***Support available if early help, section 17 and/or 47 statutory assessments are appropriate***

If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

### ***Support available if a crime may have been committed***

Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.

Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

The school will work to establish a positive relationship with the local police force and the DSL will liaise closely with the local police presence.

### ***Support available if reports include online behaviour***

Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

If the incident involves sexual images or videos held online, the [Internet Watch Foundation](#) will be consulted to have the material removed.

Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

### ***Managing disclosures***

Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.

Where an alleged incident took place away from the school or online but involved children from the school, the school's duty to safeguard children remains the same.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.

- Explaining to the victim what the next steps will be and who the report will be sent to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them, not the opinions of the adult.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and [UKCCIS sexting advice](#).
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

The DSL will be informed of any allegations of abuse against children with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the child in mind at all times.

## 9. SAFEGUARDING IN THE CURRICULUM and SUPPORTING CHILDREN

### Teaching About Safeguarding

Alma Primary is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. To this end, the school will provide regular opportunities for children to learn about keeping themselves safe. All children will be taught about staff who they can talk to. Children will be taught that we have a senior member of staff with responsibility for child protection and know who this is. We will teach children about their right to be listened to and heard and what steps can be taken to protect them from harm.

Alma Primary recognises that a child who is abused or witnessed violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self-blame.

In such situations, Alma Primary may provide the only stability in the lives of children who have been abused or who are at risk of harm. Alma Primary accepts that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggressive or withdrawn.

The school will ensure that children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such

content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

Children will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

### Online safety

As part of a broad and balanced curriculum, all children will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of the following:

- Child attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a child's online activity

The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material, in accordance with the school's planning for breaches in data and e-security. The school will ensure that the use of filtering and monitoring systems is balanced, to avoid "over blocking" which may lead to unreasonable restrictions as to what children can be taught regarding online teaching.

Where children need to learn online from home, the school will support them to do so safely in line with the school's policy on Remote Learning and current government [guidance](#).

### Supporting Children

Alma Primary will support all students by:

- Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Children's Social Care as soon as there is a significant concern.
- Providing continuing support to a child about whom there have been concerns who leaves the school, by ensuring that appropriate information is forwarded under confidential cover to the student's new school (as soon as possible).

Where staff are required to provide first aid which relates or includes genitals, a member of the safeguarding team should always be involved.

### 10. REPORTING and CONFIDENTIALITY

At Alma Primary all safeguarding concerns and any related issues are recorded using the CPOMs system, which staff are trained on.

#### Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools. All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies. Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and, where relevant, their parents.

Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the children involved in the case. Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

During the disclosure of a concern by a child, staff members will not promise the child confidentiality and will ensure that they are aware of what information will be shared, with whom and why. Where it is in the public interest, and protects children from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered. In order to maintain confidentiality, the school will only engage staff and agencies required to support the victim and/or be involved in any investigation.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the children involved. Discussions with parents will not take place where they could potentially put a child at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with

the alleged perpetrator's parents will have regard to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a child is leaving the school, the DSL will consider whether it is appropriate to share any information with the child's new provider, in addition to the child protection file, that will allow the new provider to support the child and arrange appropriate support for their arrival.

### **Anonymity**

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

### **Risk assessment**

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

### **Managing the report**

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual



harassment:

- Managing internally
- Providing early help
- Referring to CSCS
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- The age of consent is 16.
- A child under the age of 13 can never consent to sexual activity.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

### Managing internally

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

### Providing early help

The school may decide that statutory interventions are not required, but that children may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

### Referral to CSCS

If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.

***The school will not wait for the outcome of an investigation before protecting the victim and other children.***

The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm. If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

### **11. WORKING WITH PARENTS and CARERS**

Staff and parents at Alma Primary work together to educate and keep children safe from harm and to promote their welfare. We are committed to working with parents positively, openly and honestly.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child. We undertake appropriate discussion with parents prior to involvement of another agency unless to do so would place the child at further risk of harm.

We encourage parents to discuss any concerns they may have with one of the school's safeguarding personnel. Parents are made aware of who to contact if they have concerns regarding the Safeguarding of their or any other child, via the parents' handbook and website. Parents can also view this policy on request.

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

The school will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Relevant school policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Following referrals of concerns or allegations from parents, we would normally contact parents/carers within two working days to update on our progress. It may not be possible to resolve

#### **Safeguarding other children**

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

### **12. MOBILE DEVICES and UPSKIRTING**

#### **Mobile phone and camera safety**

The use of mobile phones by staff and children is closely monitored by the school, in accordance with the school's policy on Personal Electronic Devices. Staff members will not use personal mobile phones or cameras when children are present however staff may use mobile phones on school premises outside of working hours, when no children are present and in the staff areas during breaks and non-contact time. The school's digital-safety lead or the headteacher will review and authorise any downloadable apps.

Personal mobile devices will not be used to take images or videos of children or staff in any circumstances. Staff will ensure that mobile phones are safely stored and in silent mode whilst children are present. In emergency situations staff will use their professional judgement. Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when children are present. Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the Allegations of Abuse Against Staff Policy.

Photographs and videos of children will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. The Headteacher, DSL or the school's DPO will oversee the planning of any events where photographs and videos will be taken. Where photographs and videos will involve LAC children, adopted children, or children for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of a child who is a LAC or who has been adopted, liaise with the child's social worker, carers or adoptive parents to assess the needs and risks associated with the child.

The sending of inappropriate messages or images from any personal or school mobile devices is strictly prohibited. Staff who do not adhere to this policy will face disciplinary action.

#### **Upskirting**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose. This activity is referred to as upskirting and will not be tolerated by the school.

A “specified purpose” is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim’s genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

“Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion-activated camera.

Any incidents of upskirting will be reported to the DSL who will then decide on the next steps to take, which may include police involvement.

### **13. ORGANISATIONAL MANAGEMENT of SAFEGUARDING**

#### **Sports clubs and extracurricular activities**

Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard children and adhere to local safeguarding arrangements.

Paid and volunteer staff running sports clubs and extracurricular activities will be made aware of their safeguarding responsibilities and promote the welfare of children. These individuals must ensure that they fully understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

#### **Safer Recruitment**

Recruitment at Alma Primary is guided by the school’s Safer Recruitment and Selection Policy, which ensures that staff recruited undergo an enhanced DBS check along with full preemployment checks including references, barred list checks, right to work in the UK, checks for overseas where relevant and any other appropriate checks for the positions and the candidate. Internal candidates applying for promotion, recruitment for volunteer positions and for roles on the Governing Body will all be treated with the same level of rigour. All school recruitment panels will include at least one member of staff who has been trained in safer recruitment. Full details on recruitment are in the school’s policy.

#### **Staff suitability**

All centres providing care for children under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare Regulations 2018.

A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to make a formal declaration, confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be

permitted to continue working at the school, unless they apply for and are granted a waiver by Ofsted. The school will provide support with this process.

### Single central record (SCR)

The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school, along with volunteers and Governors.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

## 14. STAFF TRAINING and POLICY MONITORING

### Training

Staff members will undergo safeguarding and child protection training at induction which will cover:

- The Safeguarding Policy
- The Behaviour for Learning Policy
- The Staff Code of Conduct
- The safeguarding response to children who go missing from education
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually or whenever there is a change in legislation. This update training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep previously LAC safe.

## **Alma Primary Safeguarding Policy**

- Child criminal exploitation and the need to refer cases to the National Referral Mechanism.

Staff will receive regular opportunities to refresh their knowledge, as well as contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role. The DSL and any deputy DSLs will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff. The DSL and their deputy(s) will also undergo online safety training to help them recognise the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support children with SEND to stay safe online. Online training will also be conducted for all staff members as part of the overall safeguarding approach, on an annual basis and in response to any changes or incidents in the school.

Alma Primary recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. There is a separate Whistle Blowing Policy for this purpose.

Where a safeguarding incident involving a member of staff or group of staff falls below the threshold for LADO involvement, the Headteacher (or designated member of the safeguarding team) will lead a 'good practice review' meeting. The aim of a good practice review is to identify any improvements to guidance or practice that should be made at Alma Primary to safeguard and promote the welfare of children (both collectively and individually).

### **Monitoring and review**

The Governing Body, Headteacher and DSL (if not the Headteacher) will review this policy annually and assess its implementation and effectiveness. Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The policy will be promoted and implemented throughout the school.

### Appendix 1: Remote Learning Safeguarding and Child Protection arrangements

#### Scope

We understand during the Covid19 pandemic that we faced a time of great uncertainty and, as a school, we are doing all we can to provide clarity and safety to the school community. This appendix includes provisions which the school will have due regard for during potential periods of school closure/lockdown. The information in this appendix will be kept under constant review and updated to reflect changes to government guidance as required.

This addendum sets out changes to our normal child protection policy in light of the Department for Education's guidance and was initially applied during the period of school closure due to COVID-19, will be used in the event of any applicable future situations. Unless covered here, our normal safeguarding policy and child protection procedures continue to apply.

#### Definitions

- **Hub or Education hub:** a cluster of schools and colleges collaborating and sharing resources, staff and children in a local area.
- **Children of keyworkers:** children of parents who work in the following industries:
  - Health and social care, e.g. doctors and nurses
  - Education and childcare, e.g. teachers and DSLs
  - Key public services, e.g. the justice system
  - Local and national government, e.g. administrative occupations
  - Food and essential goods retail, e.g. supermarket workers and grocers
  - Public safety and national security, e.g. police and ministry of defence workers
  - Transport, e.g. freight transport workers and train drivers
  - Utilities, communication and financial services, e.g. bankers, oil workers, and telecommunications (999 and 111 critical services)
- **Vulnerable children:** those who have a social worker and those with EHC plans. These include children who
  - Are supported by social care.
  - Are on the edge of receiving support from social care.
  - Have safeguarding and welfare needs.
  - Have child in need plans.
  - Have child protection plans.
  - Are LAC.
  - Are young carers.
  - Are disabled.
  - Have an EHC plan.
  - Are adopted.
  - Are living in temporary accommodation.



## Alma Primary Safeguarding Policy

- Are at risk of becoming not in education, employment, or training (NEET).
- Are assessed as otherwise vulnerable by education providers or LAs.

A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989. Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

- **Volunteer staff:** staff who are working in a school that is not their usual place of work.

### Core principles

We will still have regard to the statutory safeguarding guidance, [Keeping Children Safe in Education](#). Although from time to time we may need to operate in a different way to normal, due to local lockdowns or national school closures, we are still following these important safeguarding principles:

- The best interests of children must come first;
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately using the referral process set out below;
- A designated safeguarding lead (DSL) or deputy should be available at all times (see section 4 for details of our arrangements);
- It's essential that unsuitable people don't enter the school workforce or gain access to children;
- Children should continue to be protected when they are online.

### DSL arrangements

We aim to have a trained DSL or deputy DSL either on site or available on the phone for any times when children are on the school site. All school staff will be informed by email/MS Teams as to who will be the DSL (or deputy) on any given day, and how to contact them. Details of important contacts are listed in the 'contacts' section at the start of this appendix.

On occasions where there is no DSL or Deputy DSL on site, a designated individual will take responsibility for co-ordinating safeguarding. This will be assigned on a daily basis. Their role will include:

- Updating and managing access to child protection files.
- Liaising with the offsite DSL or deputy.
- Liaising with children's social care services where required.

The DSL and deputies, wherever their location, will be kept informed of any most vulnerable children in our school who are on site on a given day.

### DSL Responsibilities

During the pandemic, the DSL and their deputy will be responsible for:

- Sharing their time and resources with other schools, where necessary.
- Ensuring staff are kept up-to-date with the latest safeguarding information and developments, including via the safeguarding partners, newsletters and professional advice groups.
- Being responsible for amending Appendix A (this section) in line with the continual changes to education policy released by the DfE and communicating all changes to staff and volunteers.
- Working with the VSH and wider LA to protect vulnerable children.

## Alma Primary Safeguarding Policy

- Providing support to teachers and pastoral staff to ensure that contact is maintained with children at home and their families.
- Ensuring staff are aware of reporting channels for safeguarding concerns.
- Ensuring there is a consistent approach to safeguarding children throughout the coronavirus pandemic.
- Speaking to children directly where possible to identify any concerns and ensuring children are provided with clear communication channels so they can report any concerns they have, including reports of child-on-child abuse.
- Providing all volunteers and volunteer staff with copies of this policy.
- Identifying a suitable member of the SLT to assume the role of temporary DSL should both themselves and their deputies become unable to work, e.g. due to illness.
- Sharing their contact information with the school community.
- Identifying vulnerable children and communicating additional safeguarding provisions to children and their families.

The DSL will report back to the governing board on all relevant safeguarding concerns.

The DSL will work with the local safeguarding partners to ensure children remain safe during full opening.

### Mental Health

During this time there is additional pressure on families and individuals which may impact on mental health and well-being, potentially causing children and staff to feel anxious and concerned. In light of this, where possible, we will continue to offer our current support for mental health for children, including providing some 1-1 sessions where possible and appropriate. The school will have due regard to Social, Emotional and Mental Health (SEMH) guidance when identifying early signs of mental health issues in children.

We will also signpost children, parents and staff to other resources to support good mental health at this time, including resources posted on the 'staying sane' section of the school websites, in the Alma together blog and through direct communication to families. Activities set for children will include opportunities to promote wellbeing. When setting expectations for work or for remote learning, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health. The school will also explore the possibilities offered by the DfE's [Wellbeing for Education Return](#) programme.

For children who are receiving education at home, e.g. children who are self-isolating, the school will support parents and children in preparing a regular plan or structure that includes time for education, playing and relaxing.

SLT will be encouraged to hold one-to-one meetings with their staff over the phone or via a video call to ensure they feel supported during this stressful time. Face-to-face support will only be provided where two-metre social distancing can be adhered to.

### Remote education

Where close of bubbles or lockdowns mean the school needs to close for periods of time, teachers will plan remote learning with the safety of children in mind, including on-line safety. Staff

## Alma Primary Safeguarding Policy

communicating with children or parents via videocall will do so either from within the school, or from an appropriate environment if working from home.

The DSL will ensure that families are able to contact them regarding safeguarding concern. Parents will be given a list of websites their child may access and any information regarding online sessions with staff that their child will be participating in. Children will be directed to practical online support where they feel unsafe and require support outside of school.

When communicating online, staff will:

- Communicate within school hours as much as possible.
- Communicate through the school channels approved by the SLT.
- Only use school email accounts and school devices for work with children.
- Not share personal information.

### Online safety

We will continue to have appropriate filtering and monitoring systems in place in school, but recognise that parents will need to be responsible for applying filters and monitoring outside of school. To this end we will organise training for parents and carers to support them in:

- Awareness of the potential risks to children online and the importance of staying safe online
- Knowing what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Awareness that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Knowing where else they can go for support to keep their children safe online

Where staff are interacting with children online, they will continue to follow our existing staff behaviour policy and any contact with children will be guided by the digital communication agreement, below.

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out below.

Teaching activities will include guidance for children in reporting any concerns they have back to our school, and signpost them to other sources of support too. Where appropriate, children will be provided with useful information and contact details of individuals and organisations they can turn to should they feel unsafe online, e.g. Childline or the UK Safer Internet Centre.

Online programmes used by staff will be checked by the school's digital-safety lead and DSL to ensure they are reputable and GDPR compliant. The school will maximise opportunities for collaboration with parents to reinforce the importance of online safety, and encourage parents to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.

Our IT support continues to operate remotely, and have their own contingency plans to ensure they can continue to support Alma Primary during this period.

### Provision in other settings

At times, individual children from Alma may be placed in an Education Hub, where there are too few children for provision to be viable at Alma. The partner school is Wolfson Hillel, Enfield. Whilst in provision at Wolfson Hillel, children are protected under Wolfson Hillel's safeguarding policy and

## Alma Primary Safeguarding Policy

any safeguarding concerns which arise during the time the child/ren are at the Hub will initially be dealt with by the Wolfson Hillel DSL.

### Working with other agencies

We will continue to work with children's social care, and with virtual school heads for looked-after and previously looked-after children.

We will continue to update this addendum where necessary, to reflect any updated guidance from the local authority about children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

### Reporting concerns inc adult staff or volunteers

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this, both for children still attending school and those at home. Staff at Alma have all been sent electronic versions of our forms for reporting concerns which have been password protected. Staff are asked to complete and return these to the DSL and phone the DSL or Deputy DSLs immediately, if they have concerns about a child.

Staff should then follow up as directed by the DSL. Following a concern reported by email or telephone the DSL will request a written report from the staff member. In case of illness or other emergency necessitating a change, any update to DSL information will be given to staff as needed. Any concerns about a member of staff or volunteer should be reported directly to the Headteacher. In the event that the Headteacher is uncontactable for a period of time due to illness or a similar situation, this concern should be report to one of the Deputy DSLs. If the concern relates to the Headteacher (or a deputy during a period when the Headteacher is uncontactable) then these concerns should be reported to the Chair of Governors.

### Reporting thresholds

During periods of school closure, the lack of direct contact with a majority of children means that the evidence base for concerns may be reduced. As such, during this time, staff may look see evidence of concerns in other areas including but not limited to work submitted by the child, participation in video lessons or sessions etc. Staff are encouraged to report any concerns that they note, even where these might normally be judged to be below the threshold of concern.

### Child-on-child abuse

Alma Primary recognises that during the pandemic a revised process may be required for managing any report of such abuse and supporting victims. We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims **child-on-child** abuse. Staff should continue to act on any concerns they have immediately – about both children attending school and those at home.

Where concerns are raised by an adult or child, the school will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

### CPD & recruitment

We continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in our school are safe to work with children. We will continue to follow our safer

## Alma Primary Safeguarding Policy

recruitment procedures, and part 3 of Keeping Children Safe in Education, ensuring that all staff have read the latest version of KCSIE.

The DSL/headteacher will risk assess any volunteers or staff from other schools to determine their suitability to work with children. Under no circumstances will volunteers who have not been checked be left unsupervised or allowed to work in regulated activity.

The DSL/headteacher will ensure any volunteers or staff from other schools are suitably trained in safeguarding and ensure that they have read the relevant sections of KCSIE, are aware of the school's safeguarding policy and procedures, and any additional local safeguarding arrangements.

The DSL/headteacher will use their professional judgement to assess how much additional safeguarding training temporary staff or volunteers require.

The school will follow safer recruitment processes, in line with the relevant policies, when acquiring new staff. In urgent cases, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS however new staff must still present the original documents when they first attend work at our school.

We will continue to do our usual checks on new volunteers, and do risk assessments to decide whether volunteers who aren't in regulated activity should have an enhanced DBS check, in accordance with paragraphs 167-172 of Keeping Children Safe in Education.

In the event that we have staff 'on loan' from other schools working in Alma, we will seek assurance from the 'loaning' school that staff have had the appropriate checks. We will also use the DBS Update Service, where these staff have signed up to it, to check for any new information. Any new staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of our safeguarding policy (and this addendum)
- Keeping Children Safe in Education part 1
- Guidance on our processes and DSL arrangements

We will keep a record of which staff and volunteers are on site each day, and that appropriate checks have been carried out for them. We will carry out a check on any existing staff who cause a concern. The school will report individuals who they consider a safeguarding risk to the Teaching Regulation Agency (TRA) by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk) – all referrals received by the TRA will continue to be considered but hearings may not be scheduled for the current time.

We will continue to keep our single central record up to date. Where required, e.g. during certain tiers of restriction in a local lockdown, we will keep a daily log detailing everyone working or volunteering in our school each day, including staff 'on loan' and details of any risk assessments carried out on staff and volunteers on loan from elsewhere.

### Attendance

From the start of the Autumn term, all children are expected to attend school. The school will have the power to issue fines for unauthorised absence; however, this will only be used as a last resort. The school will resume its regular attendance register to record attendance after fully opening and will use digital strategies to keep the Local Authority and DfE informed of attendance.

Parents will not be penalised if their child does not attend school due to following clinical or public health advice to stay at home, e.g. if they are self-isolating. In circumstances where children cannot attend school for reasons related to coronavirus, the school will use the non-attendance category: 'not attending in circumstances related to coronavirus (COVID-19)'. This category will only be used in the 2020/2021 academic year in specific circumstances, where a child does not attend school because their attendance at school, or travel to school, would go against:

- Guidance from Public Health England (PHE) or the Department of Health and Social Care related to coronavirus.
- Legislation or instruments, e.g. statutory directions, related to coronavirus.

This category of non-attendance will not count as an absence (authorised or unauthorised) and will be recorded using code X. This non-attendance category will be used for the following:

- Children who are required to self-isolate as they, or a member of their household, has symptoms or confirmed coronavirus
- Children who are required to self-isolate because they are a close contact of someone who has symptoms or confirmed coronavirus
- Children who are required by legislation to self-isolate as part of a period of quarantine (such as those returning from certain countries)
- Children who are clinically extremely vulnerable in a future local lockdown scenario only
- Children not eligible to attend school in certain local lockdown tiers of restriction, e.g. where attendance is limited to vulnerable children and the children of critical workers.

If a child is self-isolating due to having symptoms of coronavirus, but subsequently tests negative, code X will only be used up until the time of the negative result. The school will then use code I (illness) if the child remains unwell and stays at home, but will not retroactively amend the previous attendance registers because of the negative result.

The school will record and investigate any absences where a child who was expected to attend school did not, or where parents have arranged care for their child who subsequently did not attend. Where relevant, the school will report to social workers any child absence.

The school will ensure that all children's emergency contact information is correct and encourage parents to provide as many contact numbers as possible.

### Monitoring & revision

The Governing Body understands the rapidly changing environment and delegates authority to the headteacher and leadership team to make amendments to this policy, subject to confirmation from either the Chair of Governors, Vice Chair or Safeguarding Governor. Any amendments will be ratified at the next scheduled Governing Body meeting.

## Alma Primary Safeguarding Policy

### Agreement for Alma staff-children meetings using Zoom, Skype or other digital communication tools during the Covid-19 Crisis

*During the Covid-19 Crisis we are arranging for a very small number of children in our school to have 1-1 zoom sessions with a teacher, LSA or other member of staff in order to support children's, learning and wellbeing. In addition, some peripatetic teachers will arrange music lessons or similar with parents to help children continue with instruments etc. This agreement is to ensure that both the children and staff are protected and that the sessions benefit everyone. In order to go ahead with the sessions, parents will need to email the school office to confirm acceptance of this agreement.*

In order to organise such meetings parents/carers agree that:

- Zoom meetings will be arranged with your child during the period of the crisis which will normally be for 20-30 mins once per week. The meetings are optional and if the child involved does not want to take part then the meeting can be cancelled. Where possible staff will endeavour to rearrange meetings that are cancelled, but may not be able to do so in the same week.
- Meetings will only take place when organised in advance by Alma staff and using Alma staff email address. If circumstances change and the meeting can't take place, parents are asked to email the staff member who will rearrange when this is possible.
- Children taking part in a zoom meeting must be in a shared space (e.g. not a bedroom) and we expect an adult to always be present in the vicinity during the meeting, in order to safeguard children and our staff, however parents are not expected to take part in the sessions, other than giving technical support where needed.
- Staff will send parents a summary of notes from the zoom discussion and these will also be saved on Sharefile in school. Any staff contact details must be deleted after the crisis, except by agreement with the school.
- Where meetings are with indirectly employed Alma staff, such as peripatetic music teachers, then we expect them to adhere to our policies on safeguarding and any other guidance on Crisis communication we circulate.
- If parents have any concerns, following a meeting, they should contact the school leadership team or headteacher, via the office email address.

*In order to accept this agreement, please email the admin team on [office@almaprimary.org](mailto:office@almaprimary.org) copying in our [health@almaprimary.org](mailto:health@almaprimary.org) email address.*