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*ReFocus Ltd*

*Safeguarding Children Policy 2021/2022*

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The following policy has been approved by the Senior Management Team.

The policy will be reviewed on an annual basis unless circumstances arise requiring the policy to be reviewed earlier.

Approved by Senior Management Team:

Date: September 2021

X

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H Perry

Sign:

Reviewed: March 2022

Agreed by Senior Management Team:

X

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H Perry

Sign:



- This policy covers the safeguarding procedures for ReFocus Ltd.
- This policy is not stand alone and should be used with other ReFocus policies including, but not limited to: Behaviour policy, E Safety Policy, Risk Assessment Policy, the Staff handbook, and code of conduct.
- When referring to staff members this includes all full-time staff members, volunteers, support staff and supply staff.

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## Important contacts

| ROLE/ORGANISATION                         | NAME                     | CONTACT DETAILS  |
|---|--------------------------|--|
| Designated safeguarding lead (DSL)        | Hayley Perry             | hayley@refocus.school<br>07878270867   |
| Deputy DSL                                | Katie Close<br>Liam Kerr | <a href="mailto:Katie@refocus.school">Katie@refocus.school</a><br><a href="mailto:Liam@refocus.school">Liam@refocus.school</a> |
| Local Authority Designated Officer (LADO) | Andy Smith               | 01604362633  |
| Chair of governors                        | James Alcock             | <a href="mailto:governor@refocus.school">governor@refocus.school</a>   |
| Channel helpline                          |                          | 020 7340 7264  |



## 1. Aims

ReFocus aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare

All staff are aware of their statutory responsibilities with respect to safeguarding

Staff are properly trained in recognising and reporting safeguarding issues

ReFocus recognize that students that attend the school have not been able to be successful in mainstream education which brings its own level of vulnerability. Staff and management are very aware of the countywide demographics and impact of contextual safeguarding in the local area, namely knife crime and county lines and are acutely aware of up to date language used by young people in relation to this (see Appendix 4 for further information). Staff are encouraged to be nosey and challenge language and behaviours that do not meet the values and ethos of ReFocus.

ReFocus expects a proportion of our students to have external partner agencies working to support them and encourage this, including the appropriate sharing of Information as and when applicable. ReFocus will also actively look to gain consent to divert students to relevant agencies if the need arises.

Every student that attends ReFocus has an Entry Risk Assessment which is reviewed according to each individuals needs. Students should expect to be treated differently according to this and appreciate that 'every student comes with their own story'. There is a 'live workshop' on site which emphasizes the importance of assessing risk. If at any point a students risk level changes and they are deemed too high to participate in workshop based activities then an alternative task will be given and this Risk will be reviewed at least 3 monthly, or sooner if the needs arise.

ReFocus is based in Wellingborough, Northants and as such Staff are mindful of the local demographics. Staff are aware that 26% of students leave education without any formal qualifications, which is 4% higher than the national average.

Staff are also aware that Crime rates are higher than the national averages with Violent Crime and Anti-Social behaviour significantly more so. This does have an impact on how we deliver our education and what staff need to be sensitive to. There has been a rise in Knife Crime and County Lines and students have become more aware that these issues are occurring in and around our community.

## 2. Legislation and statutory guidance



This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), [Sexual violence and sexual harassment between children in schools and colleges, what to do if a child is being abused](#) and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

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

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)

This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help schools and colleges understand and teach about safeguarding

DfE advice for schools: [teaching online safety in schools](#);

- UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#); • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#);

- The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

National Crime Agency's CEOP education programme: [Thinkuknow](#);

- Public Health England: [Rise Above](#)



[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

This guidance is also for senior leadership teams

There is a condensed Part one of the guidance available at Annex A of KCSIE 2021. This may be appropriate for those staff not working directly with children.

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

Protecting children from maltreatment

Preventing 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

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

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. **Appendix 1** explains the different types of abuse.

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

**Sexting** (also known as youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. Appendix 1 defines sexting in more detail.

**Children** includes everyone under the age of 18.

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

The local authority (LA)

A clinical commissioning group for an area within the LA

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



Information is available on the following link [Schools & Educational Staff - Northamptonshire Safeguarding Children Board \(northamptonshirescb.org.uk\)](https://www.northamptonshirescb.org.uk)

#### 4. Equality statement

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

We give special consideration to children who:

Have special educational needs (SEN) or disabilities (see section 9)

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Have English as an additional language

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

Are asylum seekers

Are at risk due to either their own or a family member's mental health needs

Are looked after or previously looked after (see section 11)

#### 5. Roles and responsibilities

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

##### 5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. There is a condensed Part one of the guidance available at Annex A of KCSIE 2021. This may be appropriate for those staff not working directly with children but will be at the discretion of the DSL which is required.

Where there is a safeguarding concern, governing bodies, proprietors and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback.



[www.refocusltd.co.uk](http://www.refocusltd.co.uk) has the most up to date Policies relating to Safeguarding and Child Protection.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy (which includes the procedures to deal with peer on peer abuse), the behaviour and Anti-bullying policy, the staff code of conduct and the E-Safety policy..

The role and identity of the designated safeguarding lead (DSL) and deputies, and the safeguarding response to children who go missing from education

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

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

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

Safeguarding issues that can put children at risk of harm. Behaviours linked to drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and /or videos can be signs that children are at risk.

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization

CSE being a form of child sexual abuse.

Child Criminal Exploitation. The experiences of boys and girls being criminally exploited can be very different to boys. Indicators of CCE may also be different for girls.

The importance of taking victims seriously, keeping them safe and that victims are never made to feel like they are creating a problem for reporting abuse, sexual abuse, sexual violence or sexual harassment.

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

## **5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Hayley Perry – Deputy Head. The DSL takes lead responsibility for child protection and wider safeguarding.

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



The DSL can also be contacted out of school hours if necessary via email – [hayley@refocusltd.co.uk](mailto:hayley@refocusltd.co.uk).

When the DSL is absent, the deputies – Katie Close/Liam Kerr – will act as cover.

If the DSL and deputies are not available, [Paula Tucker/ Head teacher] will act as cover (for example, during out-of-hours/out-of-term activities).

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

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

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

Contribute to the assessment of children.

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

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

The full responsibilities of the DSL and deputies are set out in their job description.

The DSL will ensure as much information is provided as possible as part of the initial care referral in order to aid Children's social care assessments. These assessments should consider where children are being harmed in context outside the home so it's very important. By providing as much information as possible this will enable a contextual safeguarding approach.

### **5.3 The governing board**

The governing board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The governing board will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

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

All governors will read Keeping Children Safe in Education 2021.

Section 15 of this policy has information on how governors are supported to fulfil their role.

### **5.4 The headteacher**

The headteacher is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction



Communicating this policy to parents when their child joins the school and via the school website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly. This includes Online safety training and will be part of the whole school approach to safeguarding.

Ensuring the children are taught about safeguarding, including online safety.

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

## **6. Confidentiality**

ReFocus will share information with other agencies if it is in the interest of safeguarding children. This includes Northants Police, Northamptonshire County Council and Northamptonshire HealthCare Trust. This list includes but is not exclusive to CIRV, Social care and School nurse teams.

Any information shared will also include the home school that the student is linked to.

You should note that:

Timely information sharing is essential to effective safeguarding.

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

The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Schools have clear powers to share, hold and use information for these purposes.

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

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

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

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)



Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

In an emergency call 999 or make a referral to the Multi-Agency Safeguarding Hub on 03001261000

<https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2 If a child makes a disclosure to you

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

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

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

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

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

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

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

### 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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



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

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

Contact MASH (Multi-Agency Safeguarding Hub 03001267000)

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

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

It may be that children might not tell staff about their abuse and that it maybe that staff overhear a conversation or the child's behaviour changes. In which case advice should be sort as set out above and if necessary follow on to making a referral.

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

#### **Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.



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

For more information regarding Northamptonshire Early Help please email [earlyhelpsupport@northamptonshire.gov.uk](mailto:earlyhelpsupport@northamptonshire.gov.uk)

## **Referral**

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

Contact Multi Agency Safeguarding Hub on 03001267000

If you are not happy with a decision or lack of decision making by the local authority the following link assists with Case Conflict Resolution [Case and Conflict Resolution Protocol - Northamptonshire Safeguarding Children Board \(northamptonshirescb.org.uk\)](https://www.northamptonshirescb.org.uk)

## **7.5 If you have concerns about extremism**

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

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

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

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

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



Think someone is in immediate danger

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

See or hear something that may be terrorist-related

## 7.6 If you have a mental health concern

The following guidance is available for [mental health and behaviour in schools](#). This guidance can be used to help support with preventing and tackling bullying, mental health and behaviour in schools.

Please see our Behaviour and Anti-bullying policy for ReFocus processes. It is important to note that ReFocus has a zero tolerance approach to peer on peer abuse.

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

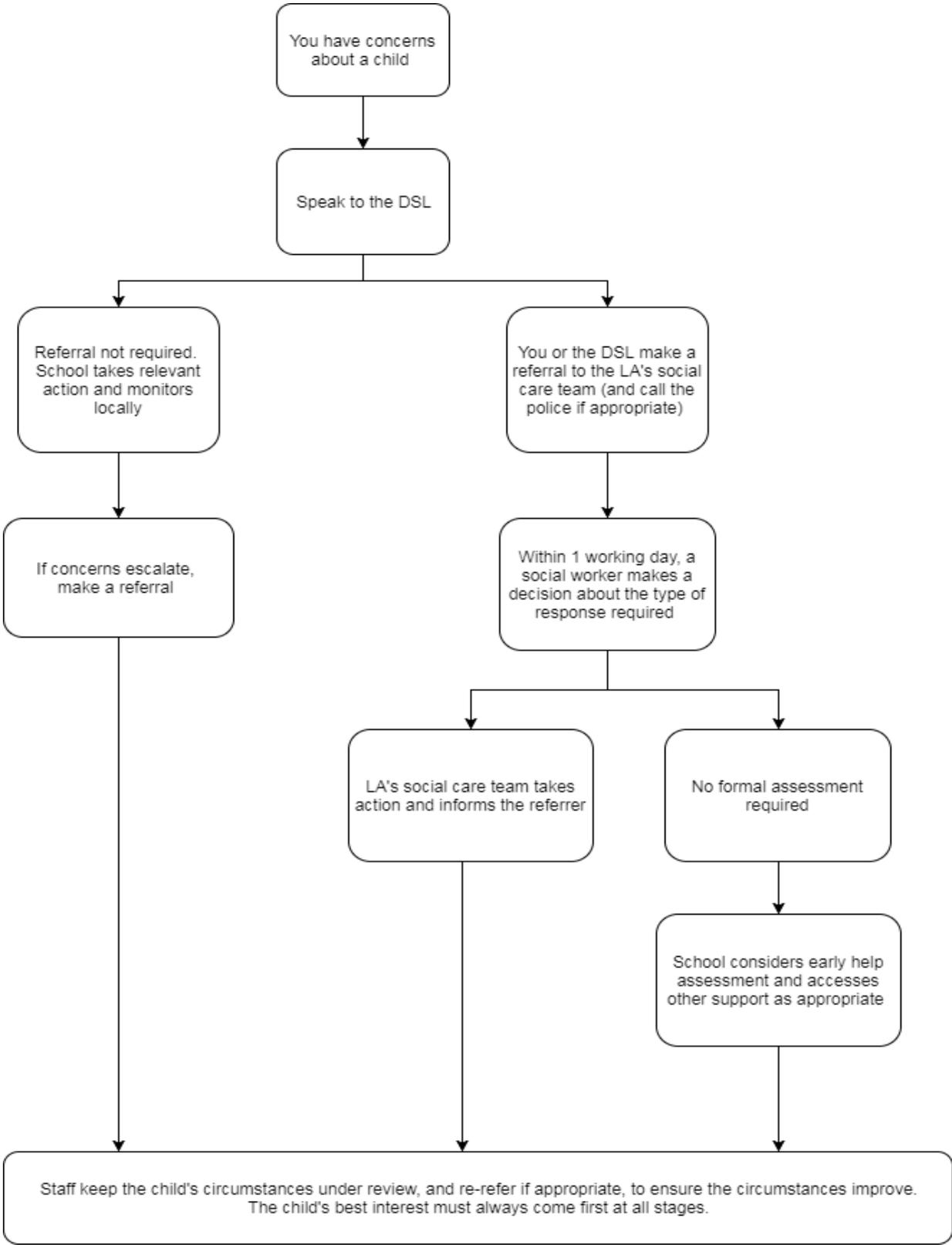
CAMHS - [Children and Adolescent Mental Health Services \(CAMHS\) Northamptonshire \(nhft.nhs.uk\)](#) or 03001111222. If a child is in crisis the Crisis team can be contacted on 01604656060.

The following resources are available for staff for [materials and lesson plans](#)



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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)





## 7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures.

ReFocus must follow the procedures for handling allegations made against staff and/or volunteers as it states *Part 4 of Keeping Children Safe in Education (2021)*. The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.

If staff have safeguarding concerns, or an allegations is made against any member of staff (**including supply staff and volunteers**), posing a risk of harm to children, then:

- the matter should be reported immediately to the headteacher who will become the Case Manager. They will liaise with the Designated Officers(s) and take advice on next steps. The case manager will speak with the member of staff concerned.
- If the concern is in relation to the headteacher then the allegation should be raised with the Chair of Governors directly. Email - [Governors@refocusltd.co.uk](mailto:Governors@refocusltd.co.uk)

If the case manager and / or DSL feel that the allegations are serious and they require immediate intervention by the children's social care services and/or police they shall contact them immediately.

In all cases immediate contact should be made with the Designated safeguarding lead/s to discuss the allegation. A decision as to how to proceed and eventually whether or not to suspend a member of staff or volunteer will be taken by the case manager following consultation with the Designated Officer(s) (and, in the most serious cases, the police). In borderline cases discussions with the Designated Officer(s) can be held informally and without naming the school or individual. Suspension is not an automatic response and the decision will be taken according to the circumstances of each particular case. The decision as to whether or not to suspend the member of staff is taken by the case manager (having consulted the Designated Officer(s)).

Primary concerns are the safety and wellbeing of the students when any decision is being made. A full and fair investigation which will be led by the Local Authority Designated Officer (**LADO**). **Contact details for LADO are Andy Smith 01604367862/ Christine York 01604 362633**

Please See Appendix 2 and 3 for further guidance in determining outcomes of allegation investigations.

## 7.8 Allegations of abuse made against other pupils



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

**It is very important that staff recognise the signs of peer on peer abuse and understand how to respond to them.**

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

Is serious, and potentially a criminal offence

Could put pupils in the school at risk

Is violent

Involves pupils being forced to use drugs or alcohol

Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

Initiation/hazing type violence and rituals (activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may be an online element)

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

You **must** record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

Ensuring pupils know they can talk to staff confidentially by challenging inappropriate behaviour and engaging in positive conversations during both structured PSHE lessons, group mentoring sessions and during social time.



Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## **7.9 Sexting**

### **Your responsibilities when responding to an incident**

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

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

Delete the imagery or ask the pupil to delete it

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to pupil(s)

If a referral needs to be made to the police and/or children’s social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment

If there is a need to contact another school, college, setting or individual



Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

The incident involves an adult

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101 for Northamptonshire Police.

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to sexting:



What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality

The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images

The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### **7.10 Allegations of sexual abuse or sexual harassment**

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.

Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report. • Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre.

(SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.



The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#).

[Contextual Safeguarding Network](#) – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.

StopItNow - [Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.](#)

## **8. Notifying parents**

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

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

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

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

## **9. Pupils with special educational needs and disabilities**

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

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration

Pupils being more prone to peer group isolation than other pupils

The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in overcoming these barriers

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

1-2-1 and group mentoring, individual learning plans and regular reviews with student, parents and any other involved agencies

As an alternative provision most students that attend ReFocus fit into the category of 'Vulnerable pupil'. As a result they should be treated as students with additional risk of harm. The vast majority of students are supported by Partner agencies for either social care needs or additional educational needs.

## **10. Pupils with a social worker**



Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

### **11. Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained teacher, Paula Tucker, Headteacher, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

### **12. Mobile phones and cameras**

Staff are allowed to bring their personal phones to Refocus for their own use, but will limit such use to non-contact time when pupils are not present.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Any photo's or video's taken and uploaded onto Social Media will only contain current students if prior consent has been obtained.

Online safety is covered in the E-safety policy, however it is important to note that many children have unlimited and unrestricted access to the internet via their own mobile phone networks. This access means some children, whilst at school or college, sexually harass



their peers via their mobile and smart technology, share indecent images, consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

As a result of this students are required to hand in their smart devices upon the request of a staff member and will have it returned for the lunch period prior to it being collected in for the remaining lessons. Any breaches of mobile phone misuse will result in phones remaining locked and secure for the entire school day.

### **13. Complaints and concerns about school safeguarding policies**

#### **13.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

#### **13.2 Whistle-blowing**

ReFocus has a separate Whistle-blowing policy. This covers the below areas:

What areas of malpractice or wrongdoing are covered by the procedures

The options available for reporting a concern, including who to approach within the school and externally

How the school will respond to such concerns

What protection is available to staff who report another member of staff

### **14. Record-keeping**

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

In all cases these records should include

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

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

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



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

Records are predominantly electronic and any written records are kept to a minimum. Any written records are kept locked and secure with limited access to only those that require it.

Records are held on a cloud based Management Information System.

The Management Information System is accessed purely by ReFocus who access a password protected platform.

How long will you retain the information?

How will you make sure records are kept confidential when appropriate?

ReFocus shares information with other agencies as and when appropriate. Personal and sensitive information is only shared with key agencies when necessary and using an encrypted email server 'egress'

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **15. Training**

### **15.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the ReFocus's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

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

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



Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **15.2 The DSL and deputies**

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

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

They will also undertake Prevent awareness training.

### **15.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

Governors and proprietors should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Annex A of KCSIE 2021 may be suitable for those governors that are not in direct contact with students.

### **15.4 Recruitment – interview panels**

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

## **16. Monitoring arrangements**

This policy will be reviewed **annually** by Hayley Perry - Deputy Head. At every review, it will be approved by the full Senior Leadership Team.

## **17. Links with other policies**

This policy links to the following policies and procedures:

Behaviour and Anti-Bullying

Staff code of conduct

Complaints



Health and safety

Attendance

Online safety

Equality and Diversity

Sex and relationship education

First aid

Curriculum

Designated teacher for looked-after and previously looked-after children

Data Protection

Whistleblowing



## **These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2021**

### **Appendix 1: types of abuse**

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

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Peer on Peer abuse is documented in our anti-bullying policy and will be dealt with swiftly and robustly.

**Sexual violence and sexual harassment** can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. They may include one or any of the following:

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Child Sexual Exploitation is a form of child sexual abuse.



Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. But it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

How ReFocus respond to an incident will impact future victims of sexual violence or harassment. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. This also prevents ReFocus students seeing this behaviour as acceptable and normalized.

Sexual assault can result in a range of health needs and signposts to sources of support are available at the end of this document. This includes physical, mental, and sexual health problems and unwanted pregnancy. A Sexual Assault Referral Centre Support is documented in the [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) guidance. The needs and wishes of the victim should be paramount. The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report

Systems are in place and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously. Staff will also be aware what to do in the case of a disclosure.

ReFocus operate a zero tolerance approach to sexual violence and sexual harassment. Any incidents of note will be reported via the correct channels with regular reviews of inappropriate behaviour and any bail considerations.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, ReFocus will consider whether any disciplinary action is appropriate against the individual who made it as per the Behaviour policy

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)



Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

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

### **New staff**

When appointing new staff, we will:

Verify their identity - Best practice is checking the name on their birth certificate, where this is available.

Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months.

Separate barred list checks must only be carried out in the following circumstances:

1. for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out)
2. where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph 213 have been carried out)

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in ReFocus. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, ReFocus will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, ReFocus will apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world. These checks could include, where available:



- criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

An individual who is subject to a section 128 direction is unable to:

- take up a management position in an independent school, academy, or in a free school as an employee;
- be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or
- be a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

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

ReFocus will use the TRA's Employer Access service to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the TRA's web page. Once registered ReFocus will use a DfE Sign-in account to log onto the service.



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

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

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

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

We believe the individual has engaged in [relevant conduct](#); or

The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

### **Contractors**

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

An enhanced DBS check with barred list information for contractors engaging in regulated activity

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



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

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

### **Trainee/student teachers**

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

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

### **Volunteers**

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

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

All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

**All governors will also have the following checks:**

Identity



Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

**Adults who supervise pupils on work experience**

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

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



### **Appendix 3: allegations of abuse made against staff**

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

Behaved in a way that has harmed a child, or may have harmed a child, or

Possibly committed a criminal offence against or related to a child, or

Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children

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

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

Our procedures for dealing with allegations will be applied with common sense and judgement.



## **Complaints that may meet the harms threshold**

In the event of allegations that might indicate a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. The government guidance from keeping children safe in education 2021 will be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If needed ReFocus Ltd will seek advice from the local authority designated officer (LADO).

A “case manager” will lead any investigation. This will be either the headteacher (Paula Tucker) or, where the headteacher is the subject of an allegation, the chair of governors (James Alcock) or chair of the management committee and in an independent school it will be the proprietor.

## **Concerns that do not meet the harms threshold**

Complaints that do not meet the harms threshold are not viewed as insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:



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

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

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (see Part Four - Section one of KCSIE 2021), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

### **Suspension of the accused until the case is resolved**

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

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

Redeployment within the school so that the individual does not have direct contact with the child or children concerned

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

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

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

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

**Substantiated:** there is sufficient evidence to prove the allegation

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



**False:** there is sufficient evidence to disprove the allegation

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

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

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the chair of governors in independent schools: where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

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

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate

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

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



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

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

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

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

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

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

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

### **Additional considerations for supply staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part



of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

### **Specific actions**

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

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

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

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

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

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

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

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether



the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

## **Confidentiality**

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## **Record-keeping**

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

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

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

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

## **References**

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



## Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual



## Appendix 4: specific safeguarding issues

### Contextual Safeguarding

The local area has key emerging issues that are having a direct impact on young people living within it. Knife crime and county lines involvement is having an effect demographically. ReFocus Ltd are committed to share information and sit on regular contextual safeguarding board meetings where it is encouraged in a confidential setting to have open and honest conversations surrounding concerns regarding key individuals and emerging issues.

ReFocus Ltd are committed to improving the quality of lives of our students and actively encourage partner agencies to work with our setting to support those individuals.

### Children missing from education

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

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

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

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



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

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

Children Missing in Education - [Report a child missing from education \(achievethecore.org\)](https://www.achievethecore.org/missing-in-education)

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

It is important to note that the experiences of girls being criminally exploited can be very different to boys.

Indicators of CCE can include a child:

Appearing with unexplained gifts or new possessions

Associating with other young people involved in exploitation

Suffering from changes in emotional wellbeing

Misusing drugs and alcohol

Going missing for periods of time or regularly coming home late

Regularly missing school or education

Not taking part in education

A significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries.

**However**, these indicators may be different for girls

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.



## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

CSE can include any child, 16-17 year olds who can legally consent to have sex, and some children may not realise they are being exploited but in a genuine romantic relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Serious violence**

All staff should be aware of the indicators that may suggest a child is at risk of serious violence. These may include the following;

- A significant decline in performance,
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries.
- Increased absence from school

A change in friendships or relationships with older individuals or groups

This may be closely linked to CCE and could indicate that children have been approached by, or are involved with, individuals involved with criminal networks or gangs.



Risk factors which increase the likelihood of involvement in serious violence are

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery.

The following guidance may help give further information [Preventing youth violence and gang involvement](#)

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#) – if your local force is not, check your local procedures and adapt if necessary.

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

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

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.



Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

## **FGM**

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin



- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place



- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

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

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

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including curriculum policy, behaviour and anti-bullying policy and e-safety policy.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.



## **Peer on peer/ child on child abuse**

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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 138 third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

## **Checking the identity and suitability of visitors**

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

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

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

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

## **Non-collection of children**

If a child is not collected at the end of the session/day, we will contact the parent in the first instance and/or any other named contacts. Children expecting to be collected will remain on site until contact can be made. In the instance where this contact is unsuccessful the DSL or deputies will contact the MASH team for advice from the Duty Social Care Team.



## Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Please see the procedure regarding missing pupils in the Attendance Policy. This includes details of who to contact and how to raise the alarm if and when necessary.

## Key contacts

**Northamptonshire Multi – Agency Safeguarding Hub (MASH)** - 0300 126 7000

### **NHFT School nurse team -**

<https://www.nhft.nhs.uk/cyprmc!~OMSelectionMarkerStart~!!~OMSelectionMarkerEnd~>

ReFocus allocated School nurse is – Victoria Prince.

**NSPCC** – Wellingborough local 01933 223920

National 0808 800 5000

[WHEN TO CALL THE POLICE \(npcc.police.uk\)](https://www.npcc.police.uk)

**CIRV** (Community Initiative to Reduce Violence) 07539 183975 – In a Gang? They can help. [www.cirv-nsd.org.uk](http://www.cirv-nsd.org.uk)

Covid- 19 Government guidance in safeguarding –

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>.

**Northamptonshire Police** 101/ 03000 111222

Local Authority Designated Officer (LADO) - [Report a concern about an adult working with children and young people - Help and protection for children \(nctrust.co.uk\)](https://www.nctrust.co.uk)

Children Missing in Education - [Report a child missing from education \(achieveservice.com\)](https://www.achieveservice.com)

Worried about a child - [Report a concern - young people \(northamptonshire.gov.uk\)](https://www.northamptonshire.gov.uk)

Child Criminal Exploitation concern

Child Sexual Exploitation

### **Domestic Abuse**

Local [Voice for Victims and Witnesses of Crime in Northamptonshire \(voicenorthants.org\)](https://www.voicenorthants.org)  
0300 303 1965

You can also download the [Voice Home Support Hub app](https://www.vedda.org.uk)

[EVE \(evedda.org.uk\)](https://www.vedda.org.uk) 01604 230311

[Northampton Domestic Abuse Service \(NDAS\)](https://www.ndas.org.uk) call 0300 0120154

National



[The National Domestic Abuse Helpline \(nationaldahelpline.org.uk\)](http://nationaldahelpline.org.uk) 0808 2000 247 (24 hours a day)

[Women's Aid](#) also offers victims a live web chat service

[Respect](#) Male victims can call 0808 8010 327 (during office hours)

[GALOP](#) LGBT victims phone line on 0800 999 5428

Operation Encompass <https://www.operationencompass.org/teachers-helpline>

### **Mental Health**

CAMHS - [Children and Adolescent Mental Health Services \(CAMHS\) Northamptonshire \(nhft.nhs.uk\)](http://nhft.nhs.uk) or 0300 1111 022

[CAMHS live \(nhft.nhs.uk\)](http://nhft.nhs.uk) is provided by Northamptonshire Healthcare Foundation Trust (NHFT) and is available to help you access the mental health services you need. You can speak to them by phone or using their online live chat from Monday to Friday, 10am to 4.30pm.

Crisis team – 01604656060

[The Lowdown](#) offer free counselling and support to young people in Northamptonshire suffering with stress or anxiety

[MIND Northampton](#) - can help with choices about stress treatment and reach out to sources of support.

[Service Six- Supporting those that need help in our community](#) - a specialist provider of outcome based professional therapeutic support, diversionary and activity services for thousands of hard-to-reach disadvantaged children, young people, adults and families - covers the Wellingborough area.

[Papyrus \(papyrus-uk.org\)](http://papyrus-uk.org) - provide confidential help and advice to young people to prevent suicide

### **Preventing Radicalisation**

[Channel Duty guidance: protecting people vulnerable to being drawn into terrorism \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

### **Keeping Safe Online whilst working from home**

[How to keep your child safe online while stuck at home ... \(unicef.org\)](http://unicef.org)

[UK Safer Internet Centre - Online Safety Tips, Advice and Resources | Safer Internet Centre](#)

[Thinkuknow - home](#)

[Childline - If something's not right - Talk to someone you trust \(bing.com\)](http://bing.com)



[Net Aware: Your guide to social networks, apps and games \(net-aware.org.uk\)](https://www.net-aware.org.uk)

<https://www.childnet.com/ufiles/Supporting-Young-People-Online.pdf>

<https://www.childnet.com/resources/supporting-young-people-online> (various languages available)

### **Sexual Abuse and Harassment**

<https://www.safeline.org.uk/abuse-or-banter-sexual-harassment-and-abuse-at-school/>

<https://www.lucyfaithfull.org.uk/>

<https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>