

# RAINHAM MARK EDUCATION TRUST

## CHILD PROTECTION AND SAFEGUARDING POLICY

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|---|---|
| <b>Review Body:</b>                     | MAT Board                                 |
| <b>Leadership Group Responsibility:</b> | CEO/Executive Principal                   |
| <b>Type of Policy:</b>                  | Statutory                                 |
| <b>Reviewed:</b>                        | Reviewed May 2021, Amended September 2021 |

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## Important contacts (RMGS)

| ROLE/ORGANISATION                         | NAME   | CONTACT DETAILS  |
|---|--|--|
| Designated safeguarding lead (DSL)        | Mrs Emma Horstrup  | <a href="mailto:ehorstrup@rmgs.org.uk">ehorstrup@rmgs.org.uk</a>   |
| Deputy DSLs                               | <p>Mr Alan Moore<br/>Mrs Lisa Barker (from Sept 21)<br/>SLT: Mr Trevor Watson, Mr Kevin Frost, Mr Mark McDowell, Mr Jez Shibli</p> <p>Inclusion Manager- Mrs Claire Else</p> <p>Heads of Year – Mrs Jane Mayes, Mr Gary Adkins, Mr Matthew Brown, Mr Aidan Harwood, Mr Andy Smith, Miss Lucy Lacey, Mr Joe Twizell, Mr S Clarke (DDSL trained).</p> <p>Office Manager - Mrs Gina Carter (DDSL trained)</p> | <p><a href="mailto:amoore@rmgs.org.uk">amoore@rmgs.org.uk</a><br/><a href="mailto:lbarker@rmgs.org.uk">lbarker@rmgs.org.uk</a><br/><a href="mailto:twatson@rmgs.org.uk">twatson@rmgs.org.uk</a>;<br/><a href="mailto:kfrost@rmgs.org.uk">kfrost@rmgs.org.uk</a>;<br/><a href="mailto:mmcdowell@rmgs.org.uk">mmcdowell@rmgs.org.uk</a>;<br/><a href="mailto:jshibli@rmgs.org.uk">jshibli@rmgs.org.uk</a><br/><a href="mailto:celse@rmgs.org.uk">celse@rmgs.org.uk</a><br/><a href="mailto:jmayes@rmgs.org.uk">jmayes@rmgs.org.uk</a>;<br/><a href="mailto:gadkins@rmgs.org.uk">gadkins@rmgs.org.uk</a>;<br/><a href="mailto:mbrown@rmgs.org.uk">mbrown@rmgs.org.uk</a>;<br/><a href="mailto:aharwood@rmgs.org.uk">aharwood@rmgs.org.uk</a>;<br/><a href="mailto:asmith@rmgs.org.uk">asmith@rmgs.org.uk</a>;<br/><a href="mailto:llacey@rmgs.org.uk">llacey@rmgs.org.uk</a>;<br/><a href="mailto:jtwizell@rmgs.org.uk">jtwizell@rmgs.org.uk</a>;<br/><a href="mailto:sclarke@rmgs.org.uk">sclarke@rmgs.org.uk</a><br/><a href="mailto:gcarter@rmgs.org.uk">gcarter@rmgs.org.uk</a></p> |
| Local authority designated officer (LADO) | Ms Maisie Adkins   | <a href="mailto:Maisie.adkins@medway.gov.uk">Maisie.adkins@medway.gov.uk</a>   |

| ROLE/ORGANISATION                   | NAME                                   | CONTACT DETAILS  |
|-------------------------------------|--|--|
| Chair of governors<br>Link Governor | Mrs Susan Griffiths<br>Rev Stephen Roe | <a href="mailto:sgriffiths@rmgs.org.uk">sgriffiths@rmgs.org.uk</a><br><a href="mailto:sroe@rmgs.org.uk">sroe@rmgs.org.uk</a> |
| Channel helpline                    |  | 020 7340 7264  |

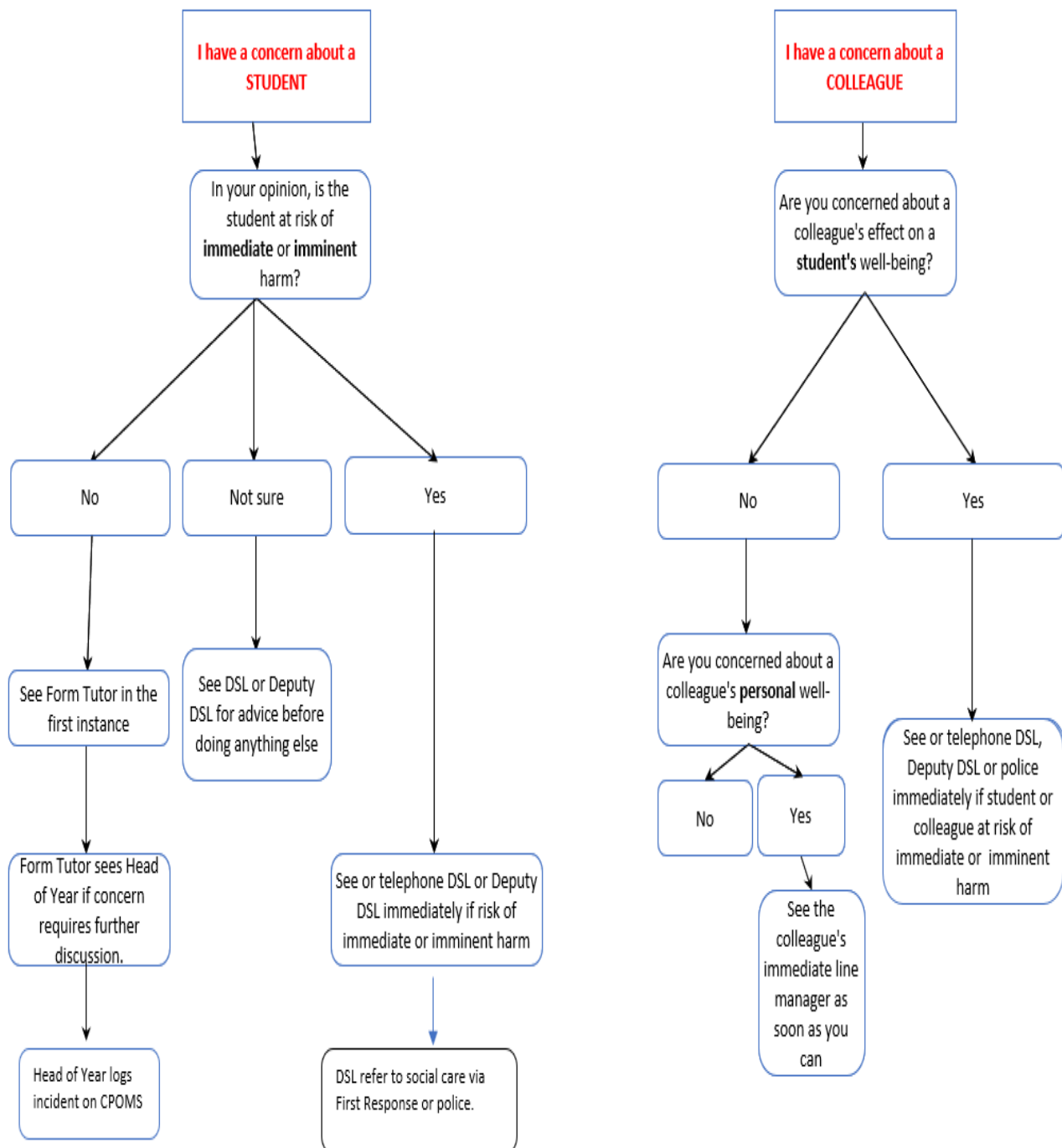
### Important Contacts (Riverside)

| ROLE/ORGANISATION                         | NAME   | CONTACT DETAILS  |
|---|--|--|
| Designated safeguarding lead (DSL)        | Mrs Kim Wilmer,<br>Headteacher                           | <a href="mailto:office@riverside.medway.sch.uk">office@riverside.medway.sch.uk</a> |
| Deputy DSLs                               | Mrs Helen Robson<br>Mrs Zoe Huggett<br>Mrs Nichol Gordon | <a href="mailto:office@riverside.medway.sch.uk">office@riverside.medway.sch.uk</a> |
| Local authority designated officer (LADO) | Ms Maisie Adkins   | <a href="mailto:Maisie.adkins@medway.gov.uk">Maisie.adkins@medway.gov.uk</a>       |
| Chair of governors<br>Link Governor       | Mr Dave Brockman   | brocd030@riverside.medway.sch.uk   |
| Channel helpline                          |  | 020 7340 7264  |

### Important Contacts (Twydall)

| ROLE/ORGANISATION                         | NAME   | CONTACT DETAILS  |
|---|--|--|
| Designated safeguarding lead (DSL)        | Mrs Catherine Logan  | <a href="mailto:logan.c@twydallprimary.org.uk">logan.c@twydallprimary.org.uk</a>   |
| Deputy DSLs                               | M. Jack Allen<br>Mrs Catherine Johnstone<br>Mrs Holly Deasy<br>Mrs Geraldine Fautley<br>Mrs Kelly Page | <a href="mailto:allen.j@twydallprimary.org.uk">allen.j@twydallprimary.org.uk</a><br><a href="mailto:johnstone.c@twydallprimary.org.uk">johnstone.c@twydallprimary.org.uk</a><br><a href="mailto:deasy.h@twydallprimary.org.uk">deasy.h@twydallprimary.org.uk</a><br><a href="mailto:fautley.g@twydallprimary.org.uk">fautley.g@twydallprimary.org.uk</a><br><a href="mailto:page.k@twydallprimary.org.uk">page.k@twydallprimary.org.uk</a> |
| Local authority designated officer (LADO) | Ms Maisie Adkins   | <a href="mailto:Maisie.adkins@medway.gov.uk">Maisie.adkins@medway.gov.uk</a>   |
| Chair of governors                        | Mr Terry Whittaker   | <a href="mailto:whittaker.t@twydallprimary.org.uk">whittaker.t@twydallprimary.org.uk</a>   |
| Channel helpline                          |  | 020 7340 7264  |

## What to do if you have a concern about a member of the school community



## 1. Aims and Ethos

The school 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.
- This policy is designed to help all stakeholders understand and access child protection and safeguarding information / resources quickly.
  - RMET recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents/carers, families and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
  - Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
  - RMET believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
  - RMET recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. All our staff understand safe professional practice and adhere to our safeguarding policies.

**Our core safeguarding principles are:**

### Prevention

- positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

### Protection

- following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.

### Support

- for all learners, parents/carers and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

### Working with parents/carers and other agencies

- to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- RMET expects that if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2020 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2020.

## 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 \(2018\)](#), 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:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- 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
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

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

### **3. Links with other policies.** This policy links to the following policies and procedures:

Attendance

Behaviour

Staff Code of Conduct

Complaints

Health and safety

Mental Health

Online safety /Social Media/ Acceptable IT use

Equality

Sex and relationship education /PSHE

First aid

Curriculum

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

Privacy notices

Whistle-blowing

### **4. Policy Compliance, Monitoring and Review**

- RMET will review this policy **annually**. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. At every review, it will be approved by the trustees.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and part one of KCSIE. These are available from the headteacher's PA. Staff will complete an electronic form to confirm they have read and understood this policy and KCSIE Part 1.
- Parents/carers can obtain a copy of the school Child Protection and Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the RMET website.
- The policy forms part of our school development plan and will be reviewed annually by the governing body which has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and Headteacher will ensure regular reporting on safeguarding activity and systems to the governing body and LA when required. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

## 5. Definitions

In line with KCSIE 2021, **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. 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/Youth Produced Sexual Imagery** is where children share nude or semi-nude images, videos or live streams.

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

RMET acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying (including cyberbullying)
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual Safeguarding (Risks outside the family home)
- County Lines
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults
- Online safety
- Peer on peer abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- Upskirting
- Youth produced sexual imagery or "Sexting"

(Also see Annex A within *Keeping Children Safe in Education 2021* and Appendix 1 of this policy for more detail)

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) – Medway Safeguarding Partnership
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

## 6. 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.
- 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 radicalization.
- 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.

## 7. Roles and responsibilities

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

### 7.1 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.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education.
- The early help process (sometimes known as the common assessment framework and as *Family Solutions* in Medway) and their role in it, including identifying emerging problems, liaising with the DSL/DDSLs, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

### 7.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team and 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.



When the DSL is absent, the deputies, Headteacher, SLT, the Inclusion Manager or relevant member of school's pastoral team will act as cover.

The LA's Education Safeguarding Officer has the personal contact details of the DSL for out of hours emergencies.

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.

### **7.3 The governing board/trustees**

The governing board/trustees 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/trustees will appoint a senior board level (or equivalent) lead or, link governor 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/trustees will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

All governors will read *Keeping Children Safe in Education* and do the update training at the start of every school year.

### **7.4 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/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

## **8. Confidentiality**

We recognise that all matters relating to child protection are confidential.

- The Headteacher or DSL will disclose any information about a child to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children in a timely fashion.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- The Trust will use CPOMS to ensure records are secure.
- We will always undertake to share our intention to refer a child to Social Care with their parents / carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt,

we will consult with the appropriate team at Medway Social Care, or the Safeguarding Team at Medway Council.

## 9. Recognising abuse and taking action – procedures

Staff, volunteers and governors/trustees 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)”.

### 9.1 If a child is suffering or likely to suffer harm, or is 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 is in immediate danger. **Anyone can make a referral.** Go here for Medway children resident in Medway <https://www.medway.gov.uk/mscb/info/5/mscb-1/34/worried-child> . Search here for a child resident outside of Medway <https://www.gov.uk/report-child-abuse-to-local-council>

Tell the DSL as soon as possible if you make a referral directly.

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

If a child discloses a safeguarding issue to you, you should follow the 6 Rs (see Appendix 6):

- 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 and tell the DSL as soon as possible that you have done so.

### 9.3 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’.

**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 or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

### 9.4 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)

The flowchart on page 3 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.

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 or *Family Solutions***

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.

Medway's threshold for referrals to Early Help/ *Family Solutions* can be found here

[https://www.medwayscp.org.uk/mscb/site/scripts/documents\\_info.php?switchstyle=style.css&categoryID=4&documentID=24](https://www.medwayscp.org.uk/mscb/site/scripts/documents_info.php?switchstyle=style.css&categoryID=4&documentID=24)

To make an Early Help / Family Solutions referral go here

[https://www.medway.gov.uk/info/200170/children\\_and\\_families/600/concerned\\_about\\_a\\_child\\_safeguarding\\_and\\_early\\_help/3](https://www.medway.gov.uk/info/200170/children_and_families/600/concerned_about_a_child_safeguarding_and_early_help/3)

### **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, 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.

## **9.5 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

## **9.6 If you have a mental health concern**

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 9.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. The Trust will refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

#### **Procedures:**

Classroom or form tutor notices mental health issues and refers to relevant member of pastoral team or DDSL who will discuss with Inclusion Manager and /or DSL who will refer to school-based mental health workers and/or recommend parents / carers take child to GP or complete NEFLT SPA independently or via pastoral staff school.

### **9.7 Staff conduct and support**

- All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents/carers to be conducted in view of other adults.
- All staff should be aware of the school Behaviour Management policies and Staff Code of Conduct.
- Guidance about conduct and safe practice, including safe use of mobile phones and social media by staff and volunteers will be given at induction.
- We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

### **9.8 Managing Allegations Against Staff and Volunteers** (for more detail see Appendix 4)

RMET recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that:

- Indicates they have harmed a child, or may have harmed a child;
  - Means they have committed a criminal offence against or related to a child;
  - 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.
- 
- If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head of School or CEO/Executive Principal.
  - This may include allegations where a member of staff may have been involved in an incident outside of school which did not involve children, but could have an impact on their suitability to work with them e.g. domestic violence. The school should use its procedure for managing allegations against staff when allegations are made against supply staff, even if they are employed by an agency.
  - The Head of School or CEO/Executive Principal on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO).
  - If the allegation made to a member of staff concerns the Head of School or CEO/Executive Principal, the person receiving the allegation will immediately inform the Chair of The MAT Board who will consult without notifying the Head of School or CEO/Executive Principal first.
  - All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Trust schools will take all concerns or allegations received seriously.
  - All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
  - RMET has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.

- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or KAPE HR who is the trust's provider of personnel and legal services.
- Suspension of the member of staff, excluding the Head of School or CEO/Executive Principal, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and Personnel Consultant in making this decision.
- We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

### **9.9 Allegations of abuse made against other pupils / peer on peer abuse and harmful sexual behaviours**

All RMET staff 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”. We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse and harmful sexual behaviour (HSB) 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 youth produced sexual imagery formerly known as *sexting*).

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.

The Trust will use government guidance contained in *Sexual violence and sexual harassment between children in schools and colleges* in cases of peer on peer abuse

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Recording incidences in the behaviour section of SIMS and CPOMS (if appropriate).
- 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.
- 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.

### **9.10 Youth Produced Sexual Imagery / Sending Nudes or Semi-Nudes (sexting)**

The Trust will use this guidance [guidance from the UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders.

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

If you are made aware of an incident involving youth produced sexual imagery (sexting), 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. Confiscating the device is an option too.
- 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/carers**

The DSL will inform parents/carers 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 reporting via the Kent police online service <https://www.kent.police.uk/ro/report/>. The DSL may also contact the Youth Engagement Officer / School Police Officer / police community support officer at Kent Police for advice.

## Recording incidents

All YPSI incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 16 of this policy also apply to recording incidents of YPSI.

## Curriculum coverage

Where appropriate, please see each school's PSHE/ Sex & Relationships Education policy for mapping and detail.

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

## 10. Parents and Carers

### Parents/carers have a responsibility to:

- Understand and adhere to the relevant school policies and procedures.
- Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the school or other agencies.

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

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

If we believe that notifying the parents/carers 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/carers of all the children involved.

## 11. 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:

- A trained member of staff who understands the child's needs.
- Training for all staff identifying the increased risks for SEND pupils.

## **12. 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.

## **13. 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 a designated teacher (RMGS - Deputy Headteacher i/c Pastoral Care) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher 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, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## **14. Mobile phones, cameras and online safety**

Staff are allowed to bring their personal phones to school for their own use.

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.

See staff Code of Conduct and Social Media Policies for more detail.

See Online Safety Policy.

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

### **15.1 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 4).

### **15.2 Other complaints**

The school has a Complaints Procedure available to parents/carers, learners and members of staff and visitors who wish to report concerns. This can be found on the RMET website here [complaints policy](#).



## 15.3 Whistle-blowing

- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/LADO following the Whistleblowing Policy. Staff are made aware of the NSPCC helpline for whistle-blowing
- Whistle-blowing re the Head of School or CEO/Executive Principal should be made to the Chair of the MAT board whose contact details are readily available to staff.
- See [RMET Whistle Blowing Policy](#) for more detail.

## 16. Record-keeping

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

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

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely in CPOMS 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.

Record keeping:

- Is electronic using CPOMS
- Pre-CPOMS records have been scanned and uploaded to CPOMS and/or paper copies are held in a locked cabinet separate from non-confidential records.
- Records are kept secure in CPOMS with limited staff access.
- The school shares records via CPOMS transfer or secure email with safeguarding partners

In addition:

- Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 17. Training

### 17.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school'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, e-bulletins and staff meetings) as required, but at least annually i.e. in the first day of the academic year safeguarding updates presentation.

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.

## **17.2 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 NOS, e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

## **17.3 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/trustees 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.

## **17.4 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.

## Appendices

### 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.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** 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.

The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying (including cyberbullying)
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual Safeguarding (Risks outside the family home)
- County Lines

- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults
- Online safety
- Peer on peer abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- Upskirting
- Youth produced sexual imagery or sending semi or full nudes or “Sexting”

## Appendix 2: specific safeguarding issues

This appendix is based on the advice in annex A of *Keeping Children Safe in Education*. A key contextual issue for RMET schools is:

- Gangs, County Lines, Serious violence, Crime and Exploitation

RMET recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe. We work with local partners who can offer expert training and advice. All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.
- Change in friendships/relationships with others/groups.
- Children who associate with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Significant decline in performance.
- Signs of self-harm/significant change in wellbeing.
- Signs of assault/unexplained injuries.

### Children missing from education

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

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

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

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

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

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

## Child 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.

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.

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 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.

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.

## 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. The DSL is the [Operation Encompass](#) contact.

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 9.3 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/carers 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 following safeguarding protocols. 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 [fmufco.gov.uk](mailto:fmufco.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. The Prevent agenda is part of the annual safeguarding update training for staff, part of the induction training and the Trust aims to refresh this non-statutory training every three years for all staff.

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 9.5 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 PSHE curriculum, behaviour policy and online safety policy.

## Appendix 3: Safer recruitment, DBS checks, and visitors – 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. Also see [Visitors in School policy](#)

### New staff

When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. 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.

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.

**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.
- Refer to p111 of Keeping Children Safe in Education when considering using volunteers.

## Governors

All trustees, local governors and members 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

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

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

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

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

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

## **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **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 in and have their photo taken on Inventory, read and keep the safeguarding information booklet issued on arrival 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:

- Ask office staff to work through the four contacts;
- Ensure a member of SLT is available to wait with the child after 4.30pm if necessary;
- Frequent incidents will be recorded in CPOMS as a potential safeguarding issue and alert HoY and FT to monitor closely for other safeguarding concerns.

## **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:

- Where the school uses them, use Lesson Monitor attendance and Lesson Issues email systems to identify missing students and ensure staff are trained to alert attendance staff regarding missing students.
- Ensure attendance staff / pastoral team are aware of pupils with social workers or vulnerabilities and that information is updated regularly.

- Alert parents/carers to non-attendance quickly.
- Alert social worker if applicable.
- Alert police if the child is in immediate danger or uncontactable by other agents.
- CME will be recorded in CPOMS and referred by the school's attendance officer to Medway AASSA Attendance Service.

## Appendix 4: Allegations of abuse made against staff

### Section 1: Allegations of abuse against staff that meet thresholds

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.

### 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/carers have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust.

### Definitions for outcomes of allegation investigations

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

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

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

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

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

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors 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. Support may be provided by trade union representatives, colleague or trust-based counsellor.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

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 academy trust 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**

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

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

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



## Record-keeping

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

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

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

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

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

## References

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

## Learning lessons

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.

## Section 2: concerns that do not meet the harm threshold or "low-level concerns"

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in above in Section 1 of Allegations of Abuse against Staff.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

## Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly 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
- Using inappropriate sexualised, intimidating or offensive language

## Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 9.8 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

## Responding to low-level concerns

Concerns should be raised directly with the headteacher. If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

*Keeping Children Safe in Education* also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children.](#)

## Record keeping

All low-level concerns will be recorded in writing using the Low-Level Concerns Form in Appendix 11. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix 5: Self Harm

Self-harm is when somebody intentionally damages or injures their body. It is usually a way of coping with or expressing overwhelming emotional distress.

### Providing Support

Supporting a child who has self-harmed can be an extremely upsetting and worrying time for their family. The school will listen to the child to try to understand the causes of the self-harm and will work to support them. This may include accessing the school counsellor, contacting parents/carers, making a medical referral such as the GP or CYPMHs /NELFT (or in extreme circumstances dialing 999).

It is sensible for anyone self-harming to see their GP for help. GPs can make a referral to a healthcare professional at a local community mental health service for further assessment. This assessment will result in the care team working out a treatment plan with them to help with the distress.

### Useful organisations

If appropriate, pastoral team members and D/DSLs can suggest young people (14+) refer themselves to the Alumina programme here <https://selfharm.co.uk/>

There are organisations that offer support and advice for people who self-harm, as well as their friends and families. These include:

- [Samaritans](#) – call 116 123 (open 24 hours a day), email: [jo@samaritans.org](mailto:jo@samaritans.org) or visit [your local Samaritans branch](#)
- [Mind](#) – call 0300 123 3393 or text 86463 (9am-6pm on weekdays)
- [Harmless](#) – email [info@harmless.org.uk](mailto:info@harmless.org.uk)
- [National Self Harm Network forums](#)
- [YoungMinds Parents Helpline](#) – call 0808 802 5544 (9.30-4pm on weekdays)

### Types of self-harm

There are many different ways people can intentionally harm themselves, such as:

- cutting or burning their skin
- punching or hitting themselves
- [poisoning](#) themselves with tablets or toxic chemicals
- misusing [alcohol](#) or [drugs](#)
- deliberately starving themselves ([anorexia nervosa](#)) or [binge eating](#) (bulimia nervosa)
- exercising excessively

### Why people self-harm

Self-harm is more common than many people realise, especially among younger people. Although some people who self-harm are at a high risk of [suicide](#), many people who self-harm don't want to end their lives. In fact, the self-harm may help them cope with emotional distress, so they don't feel the need to kill themselves.

## **Appendix 6: Keeping yourself safe when responding to safeguarding concerns (The 6 R's – what to do if...)**

### **1. Receive**

- Keep calm.
- Listen to what is being said without displaying shock or disbelief.
- Take what is being said to you seriously.
- Note down what has been said.

### **2. Respond**

- Reassure the pupil that they have done the right thing in talking to you.
- Be honest and do not make promises you cannot keep e.g. "It will be all right now."
- Do not promise confidentiality; you have a duty to refer.
- Reassure and alleviate guilt, if the pupil refers to it e.g. "you're not to blame."
- Reassure the child that information will only be shared with those who need to know.

### **3. React**

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details.
- Do not ask leading questions: "Did he/she....?" as such questions can invalidate evidence.
- Do ask open "TED" questions: Tell. Explain. Describe.
- Do not criticise the perpetrator as the pupil may have affection for him/her.
- Do not ask the pupil to repeat it all for another member of staff.
- Explain what you have to do next and who you have to talk to.

### **4. Record**

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible. Avoid writing when the child is talking. Show you are listening and then pause to take notes.
- Do not destroy your original notes but keep them safe and confidential.
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions.

### **5. Remember**

- Contact the Designated Safeguarding Lead (DSL).
- The DSL may be required to make appropriate records available to other agencies namely Medway Safeguarding Partnership <https://www.medway.gov.uk/mscb/info/5/mscb-1/34/worried-child>

### **6. Relax**

- Get some support for yourself, dealing with disclosures can be traumatic for professionals.

## Appendix 7: Keeping Safe – RMGS only

This guide is on the website and in student planners

### How RMGS Keeps You Safe – a Guide for Students and Parents/Carers



#### How RMGS keeps you safe in school

RMGS is our school and we want it to be a safe place for everybody who works or studies here. Staff at RMGS will do everything they can to make sure you are protected and happy. This document is to help you understand how we aim to keep you safe in school and to help you decide what could be a “problem” and to whom you should talk.

All staff at school will do their utmost to:

- Protect you from harm.
- Make sure nothing stops you being healthy or developing properly.
- Make sure you are safely looked after.
- Make sure you have the best life chances and can grow up happy and successful.

Staff will make the school a friendly, welcoming and supportive place to spend time in – somewhere you want to be; will be there for you to talk to if you need to and know who to ask for help; will give you safe messages during your time in school to help you learn how to look after yourself both online and in the real world, and will have all the right rules in place to look after you.

#### What is abuse?

When someone hurts you, it can be called abuse. This is when someone does something to you that is harmful, unpleasant or painful such as:

- If someone deliberately hits you, hurts you, injures you or humiliates you in different ways.
- If someone regularly says or does something that makes you feel bad about yourself or hurts your feelings which makes you feel scared, sad, upset or frightened.
- If someone shouts, threatens, hits or hurts someone you love whilst you are around which makes you scared, unhappy or worried.
- If someone doesn't take proper care of you so you feel abandoned, lonely or neglected. You might not be able to eat or wash regularly, or you might not be able to come to school every day or on time.
- If someone touches you in a way that you don't like, or which makes you feel uncomfortable or worried.
- If someone makes you look at things which make you feel ashamed, embarrassed, uncomfortable or guilty. They may ask you to keep it a secret or give you presents.
- **Remember:** abuse is *never* ok and *it is not your fault*. You must always tell someone and they will help it to stop.

#### In and out of school

All of the staff at RMGS will aim to make sure the building is safe for you to learn in and spend time in. We will make sure that we know who everyone is in the school by asking visitors to sign in at reception. You will always know who a visitor to the school is because they will have signed in at reception and will display a lanyard which will be around the visitor's neck. The buildings, outside areas and fields will be as safe as they can be for you so that you don't hurt yourself, although accidents can happen if you are not careful! If the fire

alarm goes off you should know what to do and where to go. When you leave school to go on a trip, the staff will make sure they can keep you safe.

### What we will do

At RMGS we will help you to keep safe in the following ways:

- We will do our best to spot if there is a problem. All of the staff in the school have had training in this.
- We will work with other people (including parents and carers) to help protect you and solve any problems you may have.
- We will always listen to you if you want to talk to us and need our help. We will always take you seriously.
- We will support and encourage you and will respect your wishes and views, and will provide information, advice and involve outside agencies whenever appropriate or necessary.



At RMGS you can talk to **any member of staff**, but you should know that there are a number of staff who are responsible for making sure you are safe and well cared for. People in school who can help you:

- Mrs Horstrup, Deputy Headteacher (Designated Safeguarding Lead)
- Any member of the Leadership Team (Deputy Designated Safeguarding Leads)
- Your Head of Year (Deputy Designated Safeguarding Leads from Sept 21)
- Your Form Tutor
- Mrs Jeffrey, our Pastoral Support Assistant
- Special Needs and the Learning Support Assistants (Inclusion Manager is a Deputy Designated Safeguarding Lead)
- School Counsellor (Deputy Designated Safeguarding Lead)
- Your Prefects
- The School Office (office manager is a Deputy Designated Safeguarding Lead from Sept 21)

**Tell a member of staff straight away if you are worried about your own safety or wellbeing or that of a friend. We will always listen.**

### List of External Agencies and Organisations – Updated May 2021

The pastoral teams at RMGS works with a wide range of external agencies and organisations to support children and families. The table below provides an up-to-date list of many of the most frequently used services. Refer to it should you need to call upon their support outside of school hours, such as weekends and holidays when the pastoral teams are not available to provide urgent support.

| Organisation   | Who They Are and What They Say  | Contact Details   |
|--|---|---|
| <b>Early Help and Preventative Services</b><br>   | <b>We provide services that can be accessed at a time and place that suits families to help them to do well, stay safe and resolve problems at the earliest possible opportunity, before they become more serious.</b>  | <a href="https://www.medway.gov.uk/info/200170/children_and_families/322/early_help_for_families">https://www.medway.gov.uk/info/200170/children_and_families/322/early_help_for_families</a> |
| <b>NELFT/ CYPMHS (CAMHS) – NHS Mental Health and Young Persons' Wellbeing Support</b><br> | <b>NELFT stands for North East London Foundation Trust and is the name for the Child and Young Persons' Mental Health Service (CYPMHS). It provides emotional wellbeing and mental health advice and support for young people and their families across Medway.</b> | <a href="https://www.nelft.nhs.uk/services-medway-young-persons-wellbeing/">https://www.nelft.nhs.uk/services-medway-young-persons-wellbeing/</a>   |

|  |   |   |
|--|---|---|
|  | If you are in crisis or require out of hours support please call SPA available 24 hours a day, on 0800 011 3474. They will listen and talk through the support available to you and your child.   |   |
| <b>Oasis</b><br>          | We provide support across a <b>range of needs and risks for those affected by domestic violence</b> to ensure families get the support they need  | <a href="http://www.oasisdaservice.org/raise">http://www.oasisdaservice.org/raise</a>   |
| <b>Porchlight</b><br>     | <b>We offer free support with mental health and wellbeing for people anywhere in Kent.</b><br><br>You might be struggling with anxiety or depression, experiencing stress, feeling hopeless, isolated or overwhelmed. Whatever you're facing, we are here to listen to you.   | <a href="https://www.porchlight.org.uk/">https://www.porchlight.org.uk/</a>   |
| <b>Carers FIRST</b><br>  | <b>Carers First is the service for Young Carers aged 5-18 across Medway.</b><br><br>The <b>Carers First's Medway Young Carer project</b> aims to support young people aged 5 to 18 who are in a caring role by offering them support and the opportunity to have a break from their caring role and meet others who are in a similar situation. | <a href="https://www.carersfirst.org.uk/medway/young-carers-medway">https://www.carersfirst.org.uk/medway/young-carers-medway</a>     |
| <b>Young Minds</b><br>  | We want to see a world where no young person feels alone with their mental health, and all young people get the mental health support they need, when they need it, no matter what.   | <a href="https://youngminds.org.uk/find-help/looking-after-yourself/">https://youngminds.org.uk/find-help/looking-after-yourself/</a> |
| <b>Kooth</b><br>        | <b>Your online mental wellbeing community.</b><br>Free, safe and anonymous support.   | <a href="https://www.kooth.com/">https://www.kooth.com/</a>   |
| <b>Together All</b><br> | Commissioned by over 250 organisations globally, we're <b>an online service providing access to millions with anxiety, depression and other common mental health issues.</b>  | <a href="https://togetherall.com/en-gb/our-work/">https://togetherall.com/en-gb/our-work/</a>   |
| <b>Open Road</b><br>    | Open Road provides free, confidential support to people who have issues with drugs, alcohol or mental health.   | <a href="https://www.openroad.org.uk/medway">https://www.openroad.org.uk/medway</a>   |



|   |   |  |
|---|---|--|
| <b>Holding On Letting Go</b><br> | <b>Holding On Letting Go</b> is a Kent-based charity that helps children to cope with the death of someone close to them.   | <a href="https://holdingonlettinggo.org.uk/">https://holdingonlettinggo.org.uk/</a>  |
| <b>Fearless</b><br>              | <b>Fearless</b> is a service that allows you to pass on information about crime <b>100% anonymously</b> . This means you don't have to give us any personal details.  | <a href="https://www.fearless.org/">https://www.fearless.org/</a>  |
| <b>MeeToo</b><br>                | MeeToo is a multi-award winning, free, anonymous app where young people can talk about difficult things. MeeToo provides a safe, pre-moderated (by humans) space for young people aged 11+ to experiment with opening up about whatever may be on their mind. | <a href="https://www.meetoo.help/how-meetoo-works">https://www.meetoo.help/how-meetoo-works</a>  |
| <b>Childline</b><br>            | Available for all young people, whatever the problem.<br><br>Childline also has a tool that helps you remove an image of you that you do not want online.   | <a href="https://www.childline.org.uk/">https://www.childline.org.uk/</a><br><br>0800 11 11<br><br><a href="#">Reporting and removing a nude image</a>                                       |
|                                | Self Harm: Alumina Programme where young people (14-19 year olds) can refer themselves for intervention and help.   | <a href="https://selfharm.co.uk/">https://selfharm.co.uk/</a>  |
| <b>Social Care</b><br>         | If you think you have any care and support needs, you can contact us to ask for a free assessment.  | <a href="https://www.medway.gov.uk/info/200139/social-care-and-health">https://www.medway.gov.uk/info/200139/social-care-and-health</a>  |
| <b>Police 101</b><br>          | 101 is the non-emergency contact number for any police force in England and Wales and it is available 24 hours a day, 7 days a week   | 101  |
| <b>NHS 111</b><br>             | NHS 111 can help if you have an urgent medical problem and you're not sure what to do.  | 111<br><a href="https://www.nhs.uk/nhs-services/urgent-and-emergency-care-services/when-to-use-111/">https://www.nhs.uk/nhs-services/urgent-and-emergency-care-services/when-to-use-111/</a> |
| <b>Emergency Services</b>   | Protecting life is the number one priority for police, ambulance and fire.<br><br>If there is a real possibility that someone could lose their life or be seriously injured if  | 999  |

|  |   |  |
|--|---|--|
|  | <p>they don't receive help immediately, then you need to call 999.</p> <p>Is a crime in progress? As the police, we really like to be able to catch criminals in the act. You can help us do this by calling 999 when the crime is taking place and if criminals have just left the scene of the crime.</p> |  |
|--|---|--|

## Appendix 8: RMGS COVID 19

### COVID-19 Appendix for Safeguarding & Child Protection Policy (RMGS)

**30 March 2020**

The following systems are in place in response to the changes effected by the COVID-19 pandemic.

1. "Protocols for Working from Home" guide sent out to staff re safe working on 19 March 2020 (see Document 1 in the bank below).
2. Vulnerable student list drawn up and all social worker and LAC children's parents/carers contacted to see if they are attending; all social workers contacted by either E Horstrup, C Else or Pastoral Assistant to keep them informed. All social worker details are in CPOMS. Key SLT have the vulnerable students list.
3. Details on safeguarding edited on front page of website on 20 March 2020.  
<https://www.rainhammark.com/safeguardingteamrmgs>
4. All SLT sent a reminder of how to access CPOMS.
5. Medway direction all done by 20 March 2020:

*5.1 Double-check staff know to follow your child protection procedures as usual if they have any concerns about a child, whether they're in school or not.*

*Where staff are working remotely, make sure they have contact details for your safeguarding team and LA social care team, and can access your recording and reporting systems, if not then at the least share their concerns with someone who can record and report on the system you use.*

*5.2 For any pupil with a social worker, it is important that communication with the allocated social worker is regular. Please ensure you have the correct details to work together as effectively as possible and share concerns should they arise.*

*5.3 Make sure children and parents/carers know where to go if they need help by:*

- *giving them emergency contact details for your school and safeguarding team (use work phone numbers), and the LA social care team; and*
- *sharing the number and page for Childline with pupils (0800 1111, <https://www.childline.org.uk/>) – post it on your website, online learning platform, or print the number and website and give it to pupils.*

6. DSL has worked with school counsellor re new ways of working in counselling – see new contract which covers safeguarding (Document 2 below).
7. EH has emailed all social workers to check they have all they need from RMGS.
8. Staying safe online emailed to parents/carers and link on website

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/staying-safe-online/>

#### **1. Document Bank**

##### **1. Protocols for working from home March 2020**

Dear Colleague

Please take a moment to read through the following in order to safeguard yourself and to understand the expectations when working from home.

- Colleagues should wherever possible be available to respond to queries from students each day, taking appropriate breaks.
- Clearly, if colleagues have their own children at home – or other family members for whom they need to care - it may not be possible to be available throughout the day. However, best efforts should be made to allow for questions from students or colleagues to be answered as soon as is practicable.
- Colleagues should check their school email accounts at least twice a day, at least once in the morning and once in the afternoon.
- As far as possible we would like to keep track of student progress but appreciate this is very difficult. Take the approach we would normally use in school i.e. if someone is ill we would give them time to catch up; if a student deliberately did not do any work, we would contact parents/carers. Obviously, our sanctions are limited here but we think it is vital that we contact parents/carers and students if a student is simply failing to do any work after a sustained period of time. The call initially may well be a

welfare check and then you can gauge if parents/carers know whether their child has been submitting work. The normal escalation to Head of Departments is appropriate and from Head of Departments to Head of Year if a student is failing to do any work across the board. We are sure you will agree that we do need to challenge – gently at first – but need to try to ensure all students are engaged in their learning by keeping parents/carers informed and getting parents/carers to work with us.

- If an email request is made by a member of SLT for a response by a certain time, it is really helpful if all colleagues respond by the deadline - vital for safeguarding information.
- If a colleague becomes unwell whilst at home, they should inform SLT as soon as possible by email as this will mean they are sick and therefore cannot be expected to work as above.
- Likewise, if a colleague has a family member who becomes unwell and needs to be cared for, they should inform their line manager and SLT so that appropriate advice and support can be given.
- If colleagues are worried about something that a student has communicated to them, they should email D/DSLs to ensure coverage.
- If colleagues have a particular concern that they would like to discuss with a member of SLT, or are feeling worried or anxious, they should email them in the first instance and arrange a mutually appropriate time to call each other.

### **Safeguarding Guidelines for Remote Teaching and Learning**

The potential closure of the school presents new safeguarding considerations. In the event that you are working from home to facilitate learning, please ensure that the guidance below is followed alongside the school's usual safeguarding practices and policies.

### **Communication with Students and Provision of Learning Resources**

Any teaching or **communication with students must only be through school approved channels** such as Moodle or school email.

There should be no use of webcams, Skype, FaceTime, WhatsApp, Facebook or any other method for live video or audio broadcast to communicate with students. However, you may record a teaching video or audio description e.g. to accompany a PowerPoint if you wish. Formal communication with students should take place only during normal school hours. Staff should not arrange to meet with groups of students or individuals.

### **Other considerations**

In terms of setting work, please also be mindful of certain groups who may find working from home particularly challenging.

**PPG/FSM Students (Access to Technology)** - Not every family has the technology and even if they do, there may not be enough to go round the siblings.

**SEND** - Children with autism spectrum conditions may well find it difficult to accept that 'school' work should be done at home – some find ordinary homework difficult to accept. Their levels of anxiety will be higher than usual.

### **Reporting a safeguarding concern from home**

If you do become aware of a safeguarding concern that you wish to report, please do send an email to D/DSLs with the full details of the concern. If you are concerned about a young person who does not attend RMGS then it is your duty to refer as a member of the public.

If the matter is urgent then contact the Medway Safeguarding Partnership Board (First Response) directly on 01634 334 466 or here to make an online referral

[https://www.medway.gov.uk/info/200170/children\\_and\\_families/600/concerned\\_about\\_a\\_child\\_safeguarding\\_and\\_early\\_help](https://www.medway.gov.uk/info/200170/children_and_families/600/concerned_about_a_child_safeguarding_and_early_help) and also email the details to D/DSLs.

## **2. Counselling Information and Telephone Support Agreement**

Usually counselling at Rainham Mark Grammar School is offered in person, however at this time of responding to Covid-19, we all need to think creatively about how to access the support that we need. Rainham Mark Grammar School is inviting those who are having access to counselling the opportunity to access telephone support in the meantime. If you feel that this would support you at this time, please read the agreement below very carefully and ask any questions that you need to. You and your parent/carer will need to read and sign this agreement before we can begin.

Supporting over the phone involves some challenges which are important to think about. You need to be careful that someone in your home does not overhear what is being said. We will both make sure that

telephone support takes place in a private room with a closed door and that others in the building know not to disturb the session.

Counselling sessions can help you think about what is happening in your life and discover new ways to cope. During the telephone support session, I will listen carefully so that I can help you to explore your thoughts and feelings, so that you feel clearer about your choices and actions. We may not be in the same room, but this is still your time to relax, feel, think and just be yourself. We can use this time to explore coping strategies together to help you manage this time until we resume normal counselling sessions.

Your right to privacy will be respected, which means that the details of what is shared in the telephone support session will be kept confidential. However, if you share something that indicates that you are or someone else is at risk of harm, I have a duty to report concerns to the Deputy Head who is the DSL. Although you are not at school, the school safeguarding policy is still followed.

We will arrange your appointments by email. You can do this yourself or you can ask your parent/carer to arrange this with me. You can book appointments for Monday to Wednesday 9:00 – 16:00, and Friday 9:00 – 14:00. My phone will be turned off outside of booked appointment times. If you need to cancel or rearrange a session, then you can email me directly. The Deputy Head at Rainham Mark Grammar School, will be informed of your acceptance of support.

Telephone support can be every week or every other week on a day and at a time agreed with both parties. Each session is 20 minutes long. For safeguarding reasons, I will not have access to your personal number and you will need to dial 141 before calling me. This will withhold the number you are calling from. The amount of sessions that you can have is not limited, but we will check how the support is going every 4/6 sessions to make sure that it is still useful and needed.

If you miss two sessions in a row without making contact to rearrange it or cancel, then you will be taken off the support list until you request to be added back on.

I am a member of the British Association of Counsellors and Psychotherapists and abide by their Ethical Framework for good practice. This Ethical Framework can be found on the BACP website [www.bacp.co.uk](http://www.bacp.co.uk). My commitment to clients is set out at the BACP <https://www.bacp.co.uk/media/3102/bacp-ethical-framework-2018-our-commitment.pdf>

All files and data are stored under the guidance of BACP and in accordance with GDPR.

#### **Client**

I agree to take part in telephone support sessions with Sue Allen whilst counselling is unavailable at the school site. I agree to dial 141 before entering Sue Allen's school mobile phone number (07766 267973) to protect my privacy. I agree to only call Sue Allen on this number at the arranged time and date.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

#### **Parent/Carer**

I agree for my child/child in my care to access telephone support sessions with Sue Allen whilst counselling is unavailable at the school site.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Relationship to the child: \_\_\_\_\_

Date: \_\_\_\_\_

If you have any questions you are welcome to contact me. Please sign this agreement and return it to Sue Allen at [SAllen@rmgs.org.uk](mailto:SAllen@rmgs.org.uk)

I look forward to hearing from you.



Sue Allen (School Counsellor, Rainham Mark Grammar School)

## **Protocols for live-streaming and contacting parents/carers, May 2020**

RMGS will follow the safeguarding guidance published on 19 April 2020 on live-streaming found here: <https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19#virtual-lessons-and-live-streaming>

As we move towards doing some live streaming for Year 12 students generally and in special circumstances for Year 10 in Term 6, RMGS will be following the DfE recommended guidance provided by the NSPCC guidance here: <https://learning.nspcc.org.uk/research-resources/schools/e-safety-for-schools#livestreaming>

RMGS is registered with Zoom and teachers must create an account linked to their school email for safeguarding reasons and so the 40-minute limit is removed. They must not use a personal Zoom account.

- Those staff leading the live-stream have read the NSPCC guidance and the school's instructions.
- Parental consent has been gained by asking parents/carers to opt in. The protocols for pre-live-streaming have been shared with parents/carers and students i.e.
  - not to share private information
  - not to respond to contact requests from people they don't know
  - who they should tell if they see or hear anything upsetting or inappropriate

### **Staff calling parents/carers using their own devices**

RMGS has given guidance to all staff on blocking numbers before calling parents/carers and has informed parents/carers to expect "number withheld" calls from the school. The school has also bought the services of Office UC to enable staff to block their numbers with complete confidence should they require this service. Protocols for Zoom calls have been sent to parents/carers and all staff.

### **Protocols for live-streaming 22 May 2020 - Information for teaching staff**

The school is suggesting that in Term 6 we offer some live-streaming for Year 12 generally and for Year 10 only in setting up NEA. There is **no** expectation that teachers live-stream if they do not want to, **but please could all teachers read the following guidance.**

The safeguarding guidance in April from the DfE was:

### **Virtual lessons and live streaming**

There is no expectation that teachers should live stream or provide pre-recorded videos. Schools should consider the approaches that best suit the needs of their pupils and staff.

Teaching from home is different to teaching in the classroom. Teachers should try to find a quiet or private room or area to talk to pupils, parents/carers or carers. When broadcasting a lesson or making a recording, consider what will be in the background.

In some areas, schools may also be able to seek support from their local authority when planning online lessons and activities and considering online safety.

As we move towards doing some live streaming for Year 12 students and in special circumstances for Year 10, the DfE recommends looking at the NSPCC guidance here <https://learning.nspcc.org.uk/research-resources/schools/e-safety-for-schools#livestreaming>

RMGS is registered with Zoom and teachers must create an account linked to their school email for safeguarding reasons and so the 40-minute limit is removed. They must not use a personal Zoom account.

### **Livestreaming**

Livestreaming can be used by schools to broadcast an event taking place in school or to view external events. It's a valuable educational medium which can connect your school with the community and with events outside of your locality.

To create a safe environment for children and young people when watching or engaging in a livestream, there are several things you should consider.

Before starting any livestream, remind children:

- not to share private information
- not to respond to contact requests from people they don't know
- who they should tell if they see or hear anything upsetting or inappropriate.

Whether hosting or joining a livestream, you must get consent from parents and carers and children if any images of or identifying information about the child may be used.

### **Hosting a livestream**

Hosting a livestream means any situation where the school instigates, publishes and is responsible for streaming online content. This includes livestreaming lessons, assemblies, announcements, activities, and if external visitors livestream on the school site.



### When hosting a livestream

- consider which platform to use since free platforms such as YouTube or Facebook Live do not allow you to restrict the audience
- consider inviting your audience to register to watch the stream and issue a log in and password, or look into using a custom platform if livestreaming is regularly used in your school
- familiarise yourself with the privacy settings and know how to report any offensive or abusive content
- the stream should take place in school time and on school premises\* and must be supervised by appropriate adults at all times. \*At RMGS, staff may live-stream from home if the situation is suitable and staff follow all other guidance e.g. appearance and conduct.
- be sensitive to the needs of individual students, including [deaf and disabled children](#), and children who may be sensitive to certain topics or issues that may arise during the livestream
- appropriate staff should supervise and be on hand to handle any sudden changes or upsetting developments that may occur during the livestream.
- At RMGS, we ask teachers hosting the live-stream to record the lesson and to keep that recording on their school laptop.
- At RMGS, we feel it is a good idea to have another member of staff present in the live-streamed lesson but is not essential.
- At RMGS we also feel that sending the Zoom link via email 5 minutes before the lesson starts and not before is also a sensible security step.
- Parental consent must be obtained before any live-streaming happens. For Year 12, the Head of 6<sup>th</sup> Form and team will gather consent; for individual subjects in Year 10, the Head of Department will gather the consent and will keep the Head of Year informed.
- In line with our normal behaviour policy, any student who does not meet the required standard of behaviour in a live-streamed lesson will be directed to correct their behaviour by the teacher(s) running the session until the ultimate sanction of being exited from the session and Head of Year and parents/carers informed.

### Joining a livestream

If you join a livestream that is hosted by someone outside the school, you may be able to participate through posting audio or written comments and liking or sharing the stream.

### If you are joining a livestream

- familiarise yourself with the type of content to be used in the stream and check it is appropriate and relevant
- check with the provider on how they will use the stream in future. For example, will it be kept for archive purposes and will it be broadcast as a recorded event?
- make sure pupils know they don't have to contribute to request donations on celebrity or vlogger streams
- remind pupils that any comments posted will be seen by others and cannot be edited or deleted and this can become a part of their digital footprint.

### Length of live-streams

In terms of length of live-streams the school suggests that a maximum of an hour at a time is preferable or, if you do stretch to a double lesson that there is a break in the middle. Some households will be sharing devices so less is probably more here.

Do not forget you can still narrate PPTs and post videos on the YouTube channel too to provide a mix and match approach.

Update on 2 July 2020 in light of publishing of returning to school in September government guidance

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools>

- As part of usual process, all staff and governors have been asked to read *KCSiE Part 1* (revised 17 June 2020) in time for 1 September and complete a M365 form confirming that.
- DSL will give the usual safeguarding updates training on 1 September for all teaching staff placing extra emphasis on the following point as listed in 1 June guidance  
<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

1 September training will:

- cover updates from KCSiE, June 2020

- inform staff of behaviours to watch out for that suggest a safeguarding issue and how the school's tutor programme is supporting all young people
- reflect that staff and volunteers may identify new safeguarding concerns about individual children as they see them in person following partial school closures
- inform staff and volunteers what they should do if they have any concerns about a child, including new concerns where children are returning
- stress the continued importance of all staff and volunteers acting immediately on any safeguarding concerns, including new concerns where children are returning
- stress the importance of ensuring relevant safeguarding and welfare information held on all children (including returning children) remains accurate. Schools and colleges (led by the DSL or deputy) should be doing all they reasonably can to ask parents and carers to advise them of any changes regarding welfare, health and wellbeing that they should be aware of before a child returns
- remind staff of the DSL (and deputy) arrangements
- refresh knowledge of peer on peer abuse - given the different circumstances schools and colleges are operating in, a revised process may be required for managing any report of such abuse and supporting victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach)
- what staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or college responds to any such concerns)
- the approach to protecting vulnerable children
- what arrangements are in place to keep children not physically attending the school or college safe, especially online and how concerns about these children should be progressed
- any updated advice received from the local safeguarding partners. DSLs (or deputies) should be leading the school or college's input into the local arrangements
- any updated advice received from local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need
- the continued importance for school and college staff to work with and support children's social workers, the local authority virtual school head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners



## APPENDIX 9 – RIVERSIDE PRIMARY SCHOOL - COVID-19

|  |  |
|--|--|
| <b>Name of Head teacher</b>                                  | Kim Wilmer                               |
| <b>Name of Designated Child Protection Co-ordinator/ DSL</b> | Kim Wilmer                               |
| <b>Name of School Deputy Designated Person/ DDSL</b>         | Helen Robson, Zoe Huggett, Nichol Gordon |
| <b>Name of Nominated Governor for Safeguarding</b>           | Dave Brockman                            |

During periods of extended school closure, such as during the coronavirus outbreak, the RMET Safeguarding Policy will still be applied. The following adjustments will be implemented at Riverside Primary School:

1. DSL contact numbers and email addresses will be shared with the Medway Safeguarding Education Team.
2. IT equipment will be upgraded to support remote access to CPOMS and SIMs.
3. DSLs will continue to liaise with other relevant professionals, such as social workers, and attend meetings where possible, including virtual meetings through skype, conference calling etc.
4. Where possible, there will be at least 1 DSL and 1 first aider on site each day.
5. Protocol for working from home, including safeguarding guidance and procedures, to be shared with all staff.
6. All staff to be reminded of their duty to report any concerns to a DSL or to the Medway Safeguarding team on 01634 334466.
7. Any teaching or communication with children or parents/carers must only be through school approved channels such as Class Dojo. There should be no use of webcams, Skype, FaceTime, WhatsApp, Facebook or any other method for live video or audio broadcast to communicate with students, although a teaching video or audio description for learning may be used.
8. Formal communication with children should take place only during normal school hours. Staff should not arrange to meet with groups of children or individuals.
9. SLT to divide responsibilities between the “away” team and the “home” team so that online home learning activities can be monitored by a DSL.
10. Online safety guidance to be posted on Class Dojo as reminders to children for keeping safe when using online resources and learning platforms.
11. School website front page updated to signpost concerns to Medway Safeguarding team.
12. Vulnerable families identified by DSLs (CHIN, CP, LAC) attendance in school to be monitored and followed up with relevant social worker in instances of non-attendance.
13. Other vulnerable children without a social worker to be identified by SLT and regular contact made, at least weekly, by phone or Class Dojo messaging, and recorded.
14. Where there is non-engagement by a child with online learning, the class teachers will send a reminder via Class Dojo messaging to the parent/carers. If non engagement continues then class teacher to inform a member of SLT on a weekly basis. SLT will try to make contact with these families to check on wellbeing.
15. Staff wellbeing is supported through signposting to Care First and mental health resources. Pupil and parent/carers wellbeing supported through the Wellbeing page on Class Dojo.

With regard to the phased and/or full reopening of the school, the following guidance will apply (in addition to the above):

1. All government guidance will be followed in relation to reopening, with the key safety principles of:
  - Avoiding contact with anyone with symptoms
  - Frequent hand cleaning and good hygiene practices
  - Regular cleaning of setting
  - Minimising contact and mixing
2. Staff to be reminded of safeguarding responsibilities and procedures, and asked to be vigilant to issues arising as children return, particularly around their mental health and emotional wellbeing. Engagement with home learning and resulting concerns around vulnerable children will continue to be monitored and reported to a DSL.
3. Relevant staff to be made aware of any changes to vulnerable children’s safeguarding status and any other significant information on a need-to-know basis.
4. DSLs to ensure their training is up-to-date, as and when training provision resumes.
5. Any new temporary or volunteer staff will be subject to a DBS check and will receive safeguarding training.

## APPENDIX 10 – TWYDALL PRIMARY SCHOOL – COVID 19

|   |  |
|---|--|
| Name of Head teacher                                  | Catherine Logan  |
| Name of Designated Child Protection Co-ordinator /DSL | Catherine Logan  |
| Name of School Deputy Designated Person/DDSL          | Jack Allen, Catherine Johnstone, Geraldine Fautley, Holly Deasey, Kelly Page |
| Name of Nominated Governor for Safeguarding           | Gemma Simpson  |

### **Appendix to Safeguarding for Twydall Primary School (Response to COVID 19 situation)**

This is for staff. It is a temporary appendix to the Twydall Primary School Safeguarding Appendix.

This will be updated as the situation evolves.

Twydall will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this will be: Holly Deasy

### **Guidance for staff**

- The best interests of children must always continue to come first
- If any member of staff has a safeguarding concern that a child might be in danger of immediate harm they should continue Act Immediately and make immediate contact in the following order.
  - Catherine Logan DSL
  - Jack Allen Deputy DSL (interim LAC Co-ordinator)
  - Holly Deasy Deputy DSL
  - Geraldine Fautley Deputy DSL
  - Kelly Page Deputy DSL
- If staff have concerns about a child, but do not think that they are in immediate harm they should report concern via CPOMS using this link <https://twydall.cpoms.net> and contact, Holly Deasy or Jack Allen, to alert them to the report on CPOMS
- A DSL or deputy DSL will always be available on site or remotely via mobile phone and normal procedures apply

### **Supporting children not in school**

Twydall is committed to ensuring the safety and wellbeing of all its Children and Young people. Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, we have ensured that a robust communication plan is in place for that child or young person.

Twydall recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at Twydall Primary need to be aware of this in setting expectations of pupils' work where they are at home.

Home tutors are monitoring completed work and calling pupils who have failed to complete work set to check on their well-being.

- Any teaching or communication with children or parents/carers must only be through school approved channels such as Office 365 and Tapestry. When phoning parents/carers please ensure that you have withheld your phone number.
- There should be no use of webcams, Skype, FaceTime, WhatsApp, Facebook, although a teaching video or audio description for learning may be used.
- Formal communication with children should take place only during normal school hours.
- Staff should not arrange to meet with groups of children or individuals.
- Food deliveries and staff visits to families are completed in pairs.

### **Keeping children safe online 365 and Tapestry**

During the enforced lockdown, it will be necessary to communicate with children electronically, in Years 4, 5 and 6. Staff should ensure that professional boundaries are maintained and discussions are focused only on:

- The children's welfare
- The content of the work
- Helping them access the work

- Giving specific feedback about the work
- Teachers in year groups 4, 5 and 6 are able to monitor the chat function through 365. Teachers should look for and act upon, through intervention and/or consultation with DSL, any indication of:
  - Through observing conversation or through direct report any indication that a domestic violence incident has occurred in the home (contact DSL immediately)
  - Any indication of emotional abuse
  - Any indication of Physical abuse
  - Any indication that the child is vulnerable to CSE (Child Sexual Exploitation) at home or online
  - Peer on peer abuse
  - Children giving away personal information from which they would be identified
  - Any indication that children are acting unsafely at home or online in another online platform
  - If you see any acronyms that you are not sure about, please check with a DSL

### **Live stories and Learning**

Whenever teachers are creating live learning videos, such as storytelling and assemblies:

- Be aware of your surroundings and what will be in the background of your video stream
- Wherever possible and if necessary block out the background (using functions available on the technology)

### **Supporting children in school**

- Where possible, there will be at least 1 DSL and 1 first aider on site each day.
- Twydall Primary School Site will remain secure while it is open to children and staff so that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- Twydall is committed to ensuring the safety and wellbeing of all its students and will continue to be a safe space for all children to attend and flourish.
- The Headteacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate.
- Twydall Primary will continue to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.
- Twydall will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded on CPOMS.

### **Identified Vulnerable children**

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans and children that are just below the threshold for social care intervention but are on Twydall Primary's monitor list.

The school is supporting identified vulnerable children in the following ways.

- The DSL team are calling families of children on CP, CIN and EHAs, as well as children that are just below the threshold of these categories, on a regular basis
- The DSL team are visiting identified families on CP, CIN and EHAs, as well as children that are just below the threshold of these categories and are dropping off food parcels.

### **Identifying emerging mental health difficulties**

With the change in circumstances creating more stressful family environments, there is a concern that parents/carers and children are more likely to experience negative mental health.

The Headteacher has arranged for staff to call identified parents/carers.

Staff well-being is supported through signposting to Care First and mental health resources.

Pupil and parent/carer wellbeing supported through the Wellbeing page on website and communication through email and 365.

Within face to face exchanges or during e-communication exchanges staff should look for any of the following that may indicate deteriorating mental health and report to a DSL.

- Emotional state (fearful, withdrawn, low self-esteem)
- Behaviour (aggressive or oppositional; habitual body rocking)
- Interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

### **Attendance Monitoring**

- Twydall Primary and social workers will agree with parents/carers whether children in need should be attending school
- Twydall Primary School will then follow up on any pupil that they were expecting to attend, who does not.
- Twydall Primary will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.
- In all circumstances where a vulnerable child does not take up their place at school, or discontinues, Twydall Primary School will notify their social worker.

### **Safeguarding and Clusters**

At Twydall we are working with other schools and have children on site from these schools.

The schools at which the pupils are registered will:

- Send a member of staff with the students, if appropriate
- Will ensure that Twydall Primary School staff have all of the emergency contact, allergy and medical information for that child before the child is left in the care of staff at Twydall Primary School

Reviewed by Catherine Logan and Jack Allen 1/04/2020

## APPENDIX 11 – LOW-LEVEL CONCERNS FORM FOR STAFF

### Low-Level Concerns form for Staff

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with RMET staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

|   |   |
|---|---|
| <b>Name and role of staff member completing the form:</b>   | <b>Date and time the concern/incident was raised:</b> |
|   |   |
| <b>Details of Concern</b><br>When completing this section please state the names of the student/students involved and/or the name/names of the staff member involved. Please complete this section with factual information including as much detail as you can. Please do not include opinion or emotion in the statement. |   |
|   |   |
| <b>Staff signature:</b>   | <b>Date and time the form was completed:</b>          |
|   |   |

|                      |                       |
|----------------------|-----------------------|
| <b>Received by:</b>  | <b>Date and time:</b> |
| <b>Action taken:</b> |                       |