Policy Statement

The South Devon Steiner School, hereafter referred to as the SDSS, includes The Early Childhood Department (ECD), Lower & Middle School, Upper School, including South Devon Steiner College (classes 11 & 12). This policy is one of a series in the school’s integrated safeguarding portfolio. It details how SDSS undertakes its statutory responsibilities relating to child welfare and the safeguarding of pupils at the school.

The policy has regard to the following DfE guidance and advice, (for a detailed list please refer to ‘compliance’ at the end of this policy):

1. ‘Keeping children safe in education’, September 2019 (KSCIE)
   - Disqualification under the Childcare Act 2006 (amended July 2018)
   - What to do if you’re worried a child is being abused: advice for practitioners (March 2015)

2. ‘Working Together to Safeguard Children’, July 2018, A guide to inter-agency working to safeguard and promote the welfare of children

   - The use of social media for on-line radicalisation

4. ‘Female Genital Mutilation (FGM) Act 2003’, since 2015 FGM is illegal and Section 5B of the Act introduced a mandatory reporting duty to report cases to the police.

5. ‘Children missing from education 2016’, statutory guidance sets out key principles to enable local Authorities to identify children missing education.

6. ‘Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers’ July 2018.

Until the new local arrangements are in place, no later than 29 June 2019, SDSS is working in partnership with Devon Children and Families Partnership (former known as Devon Safeguarding Children Board).

This policy is available on the school website and from the school office.
Statement of intent

- At South Devon Steiner School (SDSS) we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.
- We want everyone who comes into contact with children and young people to use their knowledge and professional judgement, as well as their human experience and instinct to protect them and act immediately where there are concerns for a child’s wellbeing.
- By creating an overall ethos of safety and care with open lines of communication and a robust set of policies and procedures we are fully committed to keeping the children in our care safe.
- We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.
- Child protection forms part of our school’s safeguarding responsibilities.
- We recognise that our school plays a significant part in the prevention of harm to our pupils.
- We are embedding teaching children to stay safe, including online into our curriculum through age-appropriate open discussions and the use of external agencies.
- We have ensured that appropriate web-browser filters and monitoring systems are in place.
- We are committed to provide a caring, positive and safe learning environment for the pupils of our school in order to promote their social, physical, emotional and moral development.

Written by

Designated Safeguarding Lead: Gaby Wood Date: March 2016

Amended: Date: September 2019

Approved by Safeguarding trustee: Juliet Crittenden Date: September 2017, November 2017, November 2018

Status & Review Cycle: Statutory/Annual Date: September 2020
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Safeguarding Key Personnel

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*See Appendix 2 for Role & Responsibilities of the DSL and the Trustee for Safeguarding
Policy Principles

- The welfare of the child is paramount.
- Safeguarding and Child Protection is everyone’s responsibility.
- Staff members are made aware to behold an awareness and attitude of “it could happen here!”
- Staff members are aware of the school’s Code of Conduct policy which includes dress code, use of language, appropriate use of mobile devices and general behaviour. Staff must avoid any conduct which could lead to questions about their motives or intentions.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Pupils and staff involved in child protection issues will receive appropriate support.
- Child Protection procedures are reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review.
- Child Protection policies and procedures should be consistent with local Devon Safeguarding Partners: Devon Children and Families Partnership and national guidelines.
- All staff receive appropriate levels of Child Protection and Safeguarding training.

Terminology

Safeguarding (SG) and promoting the welfare of children refers to the process of

- protecting children from maltreatment,
- preventing the impairment of 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 (CP) refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm. CP forms a part of safeguarding and promoting welfare.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

DSL refers to the Designated Safeguarding Lead at the school

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. (Appendix 4 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 4 defines neglect in more detail).

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

Contextual Safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL will consider the context within which such incidents and/or behaviours occur. This is known as ‘contextual safeguarding’, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

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:

1. The local authority (LA)
2. A clinical commissioning group for an area within the LA
3. The chief officer of police for a police area in the LA area

Policy Aim

- To demonstrate the school’s commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To support the child’s development in ways that will foster security, confidence and independence; and to nurture a feeling of self-worth and respect whereby the children know they will be effectively listened to.
- To include across the curriculum, opportunities which equip children with the skills needed to stay safe from abuse and the knowledge of whom to turn to for help; plus curriculum material which helps children develop realistic attitudes to the responsibilities of adult life.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
• To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
• To emphasise the need for good levels of communication between all members of staff.
• To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
• To develop and promote effective working relationships with other agencies, especially the Police, LADO and M.A.S.H.
• To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)\(^1\), and a single central record is kept for audit.

**Prevention**

We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The school will therefore:

• Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
• Include regular consultation with children e.g. through safety questionnaires.
• Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
• Include safeguarding across the curriculum, including PSHEE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety, road safety, pedestrian and cycle training.
• Ensure all staff are aware of school guidance for the use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
• Staff are aware that Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy), should be considering the context within which such incidents and/or behaviours occur: contextual safeguarding.
• The school provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans;

\(^1\) Guidance regarding DBS checks recently updated by the Protection of Freedoms Act 2012
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Staff responsibilities
All school staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns. Members of staff have a legal duty to safeguard and protect our pupils’ welfare and, in some circumstances, teachers have a statutory duty to report concerns to the Police (in cases of suspected or actual Female Genital Mutilation (FGM)). Any member of staff may be required to contribute to a case conference process (supported by the DSL).

We will ensure that:

- All staff and volunteers read KCSIE Part 1 that includes Annex A and sign to say they read and understood it.
- All staff receive information about the school’s safeguarding arrangements:
  - The school’s safeguarding statement,
  - Staff Behaviour policy (code of conduct)\(^2\),
  - Safeguarding and Child Protection policy,
  - Be aware of the Whistleblowing policy,
  - Behaviour policies covering all departments,
  - The safeguarding response to children who go missing from education,
  - The role and names of the Designated Safeguarding Lead and their deputy.

Staff, at induction, are signing an adherence form to say they have read and understood the named policies.
- All staff receive safeguarding and child protection training, including online safety at induction – see point above.
- Complete online EduCare training as requested.
  All staff wear blue ‘staff’ lanyard with ID attached during school hours and ensure that visitors without a lanyard ID are accompanied to reception.
- All staff are required to understand and adhere to the policies and procedures related to visitors, volunteers and Health & Safety

Touch and Physical Contact with Pupils
SDSS staff recognises the value that appropriate touch has for the children in our care and we will provide physical comfort or consolation to a child who expresses a need for such. We will not touch a child in a potentially sexually sensitive area unless the child has incurred injury that necessitates immediate medical attention and contact in that way. In such circumstances, we will, as adults, make every effort to ensure that another adult as witness is present in order to protect ourselves and the child. We will not touch a child who in any way expresses that they do not wish to be touched, unless in the extreme case of needing

\(^2\) The code of conduct should include acceptable use of technology, staff & pupil relationship boundaries and communications, including the use of social media.
to restrain a child who is in danger to themselves or others. If staff need to hold/restrain a child, they should always ask themselves:

- Is a less intrusive intervention preferable?
- Do we have to act now?
- Am I the best person to be doing this? In less urgent situations and if at all possible, the member of staff should advise the child calmly and repeatedly about what they are going to do and why.

Please refer to the ‘Use of Reasonable Force Policy’.

The use of mobile devices
That includes: phones, camera phones, tablets, laptops, watches, etc.
The SDSS aims to keep all children within its care safe. This includes raising awareness of potential danger through the taking of, and /or distributing of, photographs or moving images.

Please refer to the school’s ‘Mobile Camera, Phone & ICT Devices Policy’ and ‘Staff Code of Conduct Policy’.

Site security – Visitors – Parents

- Staff wear a photo ID card with a black lanyard.
- The main school gate for parent/s drop-off and pick up times are opened daily between: 8.00 – 8.30am, 12.25-12.44pm, & 2.55pm. Kindergarten parents’ times differ. Outside these times, parents visiting the site are required to enter the site through Velwell gate and to sign in and wear a visitor badge.
- Any other visitors, including and contractors, are also asked to sign in and are given a badge, which confirms they have permission to be on site: Orange/red lanyards signify no DBS and persons need to be supervised at all times, green ones that the person is DBS checked and can move unsupervised with permission.
- All visitors are made aware of our safeguarding protocol.
- All visitors are expected to observe the school’s safeguarding and health and safety regulations.
- All staff members have a responsibility to ensure our buildings and grounds are secure.
- The identity of all visitors and volunteers coming into school are checked and visitors are required to sign in and out in Reception (where a visitor log is kept) and to display a visitor’s badge while on the School site.
- The School will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the School site.
- The content of visiting speaker’s presentation is discussed prior to their coming to the School to ensure it is appropriate and, whether it is necessary to consider balance of perspectives for the children. A register of visiting speakers is retained.

Extended school and off-site arrangements
All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

Safer recruitment

Our school complies with the requirements of Keeping Children Safe in Education and the Devon County Council and ‘Devon Children and Families Partnership’ by carrying out the required checks and verifying the applicant’s identity, qualifications and work history. The school’s ‘Staff Recruitment policy’ and procedures set out the process in full and can be found on our website or from the school office.

The school maintains a single central record (SCR) in line with DfE guidance (KCSIE).

Types of Child Abuse

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional, education or community setting by those known to them or, more rarely, by others unknown to them (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Appendix 4 of this Policy outlines the definitions, signs and symptoms of abuse:
- physical
- emotional
- sexual abuse
- neglectful behaviour towards a child
- Domestic Violence and Abuse


Specific safeguarding Issues

1. FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. It is also known as “female circumcision” or cutting. FGM has been illegal in the United Kingdom since 1985. The law was strengthened in the 2003 Female Genital Mutilation Act to prevent girls travelling from the UK to undergo FGM abroad.
The mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police. This responsibility cannot be transferred. While mandatory reporting is limited to specified professionals, if you suspect that a girl under the age of 18 has had FGM carried out on her or you observe physical signs which appear to show FGM has been carried out, then you should report this to your designated safeguarding lead and involve children’s social care as appropriate. See Appendix 5 for further information.

2. A forced marriage is where one or both people do not or cannot consent to marriage and pressure or abuse is used. It is an indefensible practice and is recognised in the UK as a form of violence against both men and women. Forced marriage is different to an arranged marriage, where the families of both prospective spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement rests with both the people involved.

3. So-called ‘honour-based’ violence/abuse (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. They are often linked to reasons such as refusing to enter an arranged marriage, being in a relationship that is disapproved by their family, having sex outside of marriage, becoming the victim of rape, dressing in ways which are deemed inappropriate, engaging in homosexual relations or renouncing a faith. Honour killings are especially targeted against women and homosexuals, and occur in various cultures worldwide, including in the UK.

4. Child sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child’s physical and emotional health. It may also be linked to child trafficking.

The school includes the risks of Child Sexual Exploitation (CSE) in the PSHEE and RSE curriculum. A common feature of sexual exploitation is that the child often doesn’t recognise the coercive nature of the relationship and doesn’t see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse:

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

All staff are made aware of the indicators of CSE and all concerns are reported immediately to the DSL. There is a ‘CEOP’ (Child Exploitation and Online Protection) button on our website which allows anyone to make a report to one of the CEOP’s Child protection advisers.

However, there are a number of tell-tale signs that a child may be being groomed for sexual exploitation. These include:

- going missing for periods of time or regularly returning home late
- regularly missing school or not taking part in education
- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections
- mood swings or changes in emotional wellbeing
- drug and alcohol misuse
- displaying inappropriate sexualised behaviour

For further information please refer to the ‘Child sexual exploitation, Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation’, February 2017, DfE document.

5. Criminal exploitation - County Lines - of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: ‘County lines’ is the police term used to describe gangs supplying drugs to suburban areas, market and coastal towns across the UK using dedicated mobile phone lines. These organised crime networks exploit children and young people to store, move, sell and deliver their drugs, often making them travel across counties. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

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

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

6. Radicalisation refers to the process by which a person comes to support forms of extremism and terrorism. Radicalisation can happen in many different ways and settings. Many factors can contribute to a child or young person’s vulnerability, including their background, family, friends or online contacts. An extremist or terrorist group may also appear to provide an answer to a child’s unmet needs. Please refer to the school ‘Prevent Duty – Anti-Radicalisation policy’.

7. The government’s definition of Domestic Violence and Abuse is:
‘Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.’ The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional aspects.

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

“Schools are well placed to increase awareness and understanding of the seriousness of Domestic Abuse and to support children/young people and their families in accessing further support services. Domestic violence impacts on the health and welfare of children and young people. Children are often affected by the fear, distress and disruption to their lives.”

It is important that once a disclosure has occurred and all correct channels are in place, that the School maintain a regular exchange of information with a parent/carer (provided they are not under any investigation linked to the alleged abuse) and any support worker attached to the family whether employed by a statutory or voluntary organisation.

SDSS is part of ‘Operation Encompass’ in partnership with Devon and Cornwall Police and the DSL and DDSL are the designated key adults.

8. Online abuse
The breadth of issues classified within online safety is considerable, but they can be categorised into three areas of risk.

- Content: being exposed to illegal, inappropriate or harmful material; for example, seeing inappropriate images
- Contact: being subjected to harmful online interaction with other users; for example, being groomed
• Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, online bullying.

9. **Peer-on-peer abuse** can be physical, sexual, emotional and financial abuse. Children can abuse other children and staff should be aware that Safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include (but is not limited to) bullying (including cyber-bullying), gender based violence/sexual or physical assaults and sexting*. Physical abuse can be hitting, kicking, shaking, biting, and hair pulling or otherwise causing physical harm. It can also be coercive control exercised between children and young people within their relationships. Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. Different gender issues can be prevented when dealing with peer on peer abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation type violence.

*Upskirting: “Involving taking pictures under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.” (KCSIE 2019 addition due to change of law April 2019, upskirting has become a criminal offence under the Voyeurism Act.)

It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found:

The allegation:

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the School
- Indicates that other pupils may have been affected by this student.
- **SEXTING:** We follow the guidance given to schools by the UK Council for Child Internet Safety (UKCCIS) published in 2016: ‘Sexting in schools and colleges, responding to incidents and safeguarding young people’ and ensure that our PSHEE programme delivers appropriate information and awareness to our pupils.
- Additional Information relating to Allegations & Disclosures of Peer on Peer Abuse, Sexting, Sexual Violence and Sexual Harassment can be found in Appendix 7.
- Please refer to our ‘Anti-Bullying’ and ‘Cyberbullying’ policies.

We will support the victims of peer on peer abuse by ensuring staff are aware of peer on peer abuse and observe and report all concerns to the DSL/DDSL. We take all allegations/concerns seriously and will follow through, investigate and put measures in place to prevent its continuance and monitor its effectiveness. Pastoral Care, the Safeguarding Team, Class Teachers and Guardians will (as appropriate) be involved in these processes and each incident will be treated on a case by case basis. Records on peer on peer abuse will be kept securely in respective pupil’s safeguarding records.

10. **Sexual violence and sexual harassment** can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
Sexual violence and harassment can occur face-to-face, online, physically or verbally. It should not be seen as ‘banter’, ‘part of growing up’ or ‘just having a laugh’. The DfE published detailed advice on ‘Sexual violence and sexual harassment between children in schools and colleges’, May 2018.

The DSL with the Safeguarding team will decide on a case by case basis on the best course of action and response, considering whether to manage the case internally, seek Early Help with a multi-agency approach, refer to Social Care and/or report the case to the Police.

**Risk Assessment**

When there has been a report of peer on peer abuse the DSL will make an immediate risk and needs assessment.

In all cases of peer on peer abuse, but especially those involving sexual violence and/or sexual harassment, the risk and needs assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the School, especially any actions that are appropriate to protect them;

The DSL will engage with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments will be used to inform the School’s approach to supporting and protecting pupils.

**11. Serious Violence** (added KCSIE 2019)

Homicides and gun and knife crime are key factors which account for around 1% of all recorded crime. Serious violence strategy focuses around:

- Tackling county lines
- Early intervention and prevention
- Supporting communities and local partnerships
- Effective law enforcement and the criminal justice response

All staff should be aware of indicators, which may signal children are at risk, or are involved with serious violent crime:

- Significant decline in performance
- Signs of self-harming
- Significant change in well-being, mood, friendship groups
- Absence from school
- Signs of assault and/or injury
- Unexplained gifts or possessions

Further advice is provided by the Home Office’s: ‘Preventing youth violence and gang involvement’ and its ‘Criminal exploitation of children and vulnerable adults: county lines’ guidance.

**12. Child trafficking and modern-day slavery**

Child trafficking is a very serious issue which can have a devastating and lasting impact on its victims. Children can be trafficked into, within and out of the UK. Children are trafficked for many reasons including: sexual exploitation, domestic servitude, labour, benefit fraud, theft, and working in cannabis farms and work in the sex industry.
13. **Fabricated or induced illness** (FII, also known as Munchausen's syndrome by proxy) is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in a child. [https://www.nhs.uk/conditions/fabricated-or-induced-illness/](https://www.nhs.uk/conditions/fabricated-or-induced-illness/)

14. **Parenting capacity**

Put simply, research tells us that parenting capacity is ‘the ability to parent in a ‘good enough’ manner long term’ (Conley, 2003)*.

‘Good enough’ parenting means:
- meeting children’s health and developmental needs
- putting children’s needs first
- providing routine and consistent care
- acknowledging problems and engaging with support agencies.

Risky parenting is associated with:
- neglecting basic needs; putting adults’ needs first
- chaos and lack of routine
- an unwillingness to engage with support services.

*(Kellett and Apps, 2009)*

Of course, ‘good enough’ parenting is a subjective matter and one person's idea of what is ‘good enough’ may be very different to another. Again, we need to use our professional knowledge and judgement to assess what a ‘reasonable’ person would consider ‘good enough’.

15. **Adverse childhood experiences (ACEs)** are stressful or traumatic events, including abuse and neglect. They may also include household dysfunction such as witnessing domestic violence or growing up with family members who have substance use disorders. ACEs are strongly related to the development and prevalence of a wide range of health problems throughout a person’s lifespan, including those associated with substance misuse.

ACEs include:
- Physical abuse
- Sexual abuse
- Emotional abuse
- Physical neglect
- Emotional neglect
- Intimate partner violence
- Mother treated violently
- Substance misuse within household
- Household mental illness
- Parental separation or divorce
- Incarcerated household member

*(Substance Abuse and Mental Health Services Administration (SAMHSA))
16. **Children Missing from education (CME)**

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about child sexual exploitation. We monitor attendance carefully and address poor or irregular attendance without delay. We will follow up with parents/carers when pupils are not at school. This means we need to have at least two up-to-date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if numbers change. Further details can be found within SDSS's ‘Attendance and Lateness’ policy. We will ensure that pupils who are expected to attend the School, but fail to take up a place, will be referred to the local authority and that, when a pupil leaves the school, we will record the name of the pupil’s new school and their expected start date.

In line with KCSIE 2019 the school has:
- staff who understand what to do when children do not attend regularly
- appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

Procedures to inform the local authority when we plan to take pupils off-roll when they:

1. Leave school to be home educated
2. Move away from the School’s location
3. Remain medically unfit beyond compulsory school age
4. Are permanently excluded
5. Are in custody for four months or more (and will not return to school afterwards)

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. In some circumstances, the School has a legal duty to report absences to the Local Authority. With reference to ‘Children missing education’, Statutory guidance for local authorities September 2016.

17. **A Private Fostering** arrangement is one that is made privately (without involvement of the Local Authority) for the care of a child under 16 (18 if the child is disabled) by someone other than a parent or close relative (grandparent, brother, sister, half siblings and step-parents) in their own home, with the intention that it should last for 28 days or more. Parents and private foster carers have a legal duty to notify the Local Authority of such arrangements at least 6 weeks before the arrangement is due to start. Not to do so is a criminal offence. The School has a mandatory duty to report to the Local Authority where they are aware or suspect that a child is subject to a private fostering arrangement.

If staff have reason to suspect that a child is in such a private fostering relationship they must notify the DSL or DDSL who will investigate by speaking to the family of the child and check they are aware of their duty to inform. The School has a duty to inform the local authority of the private fostering arrangements. On admission to the School we will take steps to verify the relationship of the adults to the child being registered with the School.

18. **Looked after children**: Designated Teacher: Karol Hassall: karola.hassal@steiner-south-devon.org
The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child’s looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child’s social worker and the name and contact details of the local authority’s virtual head for children in care.

19. Children staying with host families
The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable. In such circumstances the school follows the guidance in Annex E of ‘Keeping children safe in education’ - homestay during exchange visits - to ensure that hosting arrangements are as safe as possible.

Our visiting student coordinator, Karola Hassall: karola.hassal@steiner-south-devon.org, coordinates the exchange and visiting student programme at SDSS.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are: disabled or have special educational needs

- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.
Safeguarding and Child Protection Policy

Particular attention will be paid to the attendance and development of any child who has been identified as being at risk or who has been placed on any Child Protection Plan.

Children Services (M.A.S.H.) will be notified immediately if:

- The SDSS should have to exclude such a child;
- There is any unexplained absence of such a child of more than two days’ duration, or one following a weekend;
- If a child on a plan changes school, we will ensure that appropriate records are transferred to the receiving school.

Procedures for Dealing with Allegations or Concerns about a Child

Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”.

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

Make a referral to children’s social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral. https://www.devon.gov.uk/educationandfamilies/child-protection/making-a-mash-enquiry

Key points for staff to remember for taking action are:

- Report your concern as soon as possible to the DSL, within 2 hours
- Do not start your own investigation
- Share information on a need-to-know basis only - do not discuss the issue with colleagues, friends or family
- Complete an incident report on CPOMS (http://steinersch.cpoms.net)
- Seek support for yourself if you are distressed

If you are concerned about a pupil’s welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil’s behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS (http://steinersch.cpoms.net) to record these early concerns.

If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL immediately or within 2 hours.

All members of staff should be familiar with the ‘DSCB Threshold Tool’, i.e. Practice guidance for improving outcomes for children and young people through the early identification of need and vulnerability. Any member of staff can use the tool to clarify what action needs to be taken.
Where allegations concern a member of staff, the DSPs must follow the procedures detailed in Appendix 1 of this policy.

**How to deal with direct disclosures of abuse from pupils**

- Listen to the pupil, allow them to speak freely, keeping calm and offering reassurance through nods, or words of comfort – “I am so sorry this has happened”, “I want to help”, “This isn’t your fault”, “and you are doing the right thing in talking to me”.
- Allow the child to lead the discussion if a disclosure is made, but not press for details by asking questions, e.g. “what did they do next?”
- Listen — don’t investigate or ask leading questions, but use questions such as “is there anything else you’d like to tell me?”
- Accept what the pupil says without challenge
- Reassure them that they are doing the right thing and that what has happened is not his/her fault
- Do not criticise either the child or the alleged perpetrator.
- Observe bruises, but not ask a child to remove or adjust their clothing to observe them.
- Do not promise confidentiality - at an appropriate time tell the pupil that in order to help them, you must pass the information on and explain to whom and why
- When abuse by another child is suspected, Child Protection procedures will be applied to both (alleged) abuser and abused. If appropriate, the school’s disciplinary procedures will be invoked.
- Make accurate and detailed notes immediately after the conversation.

**Reporting directly to M.A.S.H.**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children’s social care, police or the NSPCC if:

- If a child is already on a care plan (M.A.S.H. considers this an open case and refer to the case team).
- The situation is an emergency and the Designated Safeguarding Lead and their Deputy, and the chair of governors are all unavailable.
- They are convinced that a direct report is the only way to ensure the pupil’s safety.
- For any other reason they make a judgement that direct referral is in the best interests of the child.

**Assessing child welfare and child protection concerns**

It is the responsibility of the local authority to investigate any concerns raised about a child’s welfare. If the child is in immediate danger the local authority or an authorised person (including the NSPCC) can take the following action through the courts:

- an emergency protection order can be issued to immediately remove a child to a place of safety.
- an exclusion order can be issued to remove the abuser from the family home.
- a child assessment order can be issued for a children’s social worker to assess the child’s needs without the parents’ or carers’ consent.
- the police can remove a child to a place of safety for up to 72 hours without obtaining a court order.
- a female genital mutilation protection order (FGMPO) can be applied for through a family court and offers the means of protecting actual or potential victims from FGM under the civil law.
Assessing the risk of significant harm
If information gathered during an assessment suggests that a child is suffering or likely to suffer significant harm (see appendix 3), the local authority should hold a strategy discussion to enable it to decide, with other agencies, whether it must undertake a section 47 enquiry. A Section 47 enquiry refers to Section 47 of the Children Act 1989 and involves social workers gathering evidence and speaking with the child, family and other relevant professionals to determine if any interventions may be beneficial to the child’s welfare. All assessments should be completed within 45 working days from the point of referral into local authority children's social care.

Child Protection Conference
A child protection conference is held if a child is assessed as being at risk of significant harm. It may also take place where there are concerns about an unborn child. Relevant professionals can share information, identify risks and outline what needs to be done to protect the child - this must happen within 15 working days of the strategy discussion. Professionals draft a child protection plan which the core group will develop and implement. A core group is set up of family members and professionals.

M.A.S.H. referral
If an enquiry is made to M.A.S.H. by telephone, the DSP will confirm it in writing within 48 hours and will inform designated safeguarding trustee and the SLT that a referral has been made. M.A.S.H. should acknowledge any written enquiry within one working day of receiving it, so if the DSL/DSP has not heard back within 3 working days, they should contact M.A.S.H. again. Once an enquiry has been made, further steps taken will depend upon advice given by M.A.S.H..

https://www.devon.gov.uk/educationandfamilies/child-protection/making-a-mash-enquiry

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from M.A.S.H. and/or the police before parents are contacted. (Note: The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children). See Appendix 3.

If there is concern about a child’s welfare, the DSL/DSP will take one or more of the following actions:

- Speak to or arrange for the pupil to be spoken to informally by the Class Teacher, or other relevant member of staff, to clarify any incident or disclosure. The role of the interviewing teacher is to be descriptive, not diagnostic or judgemental. (See page 18 for guidelines).
- Speak to the parents (or ask the child’s teacher to speak to the parents), to assess whether any explanation given about the incident or injury is plausible and consistent with the situation causing concern.
- Monitor the situation further and work with the ‘Threshold Tool’.
- Work with the Early Help Locality Officer and ‘Right For Children’ database and complete an Early Help Assessment (EHC).
If you have concerns about extremism
If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see ‘Referral’ above).
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter-extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Please refer to our Prevent – Radicalisation Policy available on our website

Please refer to our Referral flow chart in Appendix

Early Help
The Devon Children and Families Partnership Threshold Tool describes the kind of needs a child may have broken down by 4 levels. Using this tool helps us to work out what kind of additional help children and their families might need in order to be safe and well. The continuum is designed to help with professional discussions and the links below provide further details on the use.
Within the School, Early Help is flagged by staff to the Safeguarding Team in order to best support the children. Such support is likely to involve multi-agency working alongside internal support mechanisms.

Further guidance can be found:

https://www.devonchildrenandfamiliespartnership.org.uk/workers-volunteers/early-help/
- Early Help Journey – Flowchart
- A One Minute Guide to Early Help in Devon

See Appendix 8 for Early Help Locality Officers’ contact details.
Confidentiality, Consent and Information Sharing

All staff who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children’s welfare.

It is essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

The School may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children’s Social Care.

We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and GDPR and will be treated as ‘special category personal data’. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe. Fear 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.

We should be sharing any concerns we have with parents at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals. Relevant personal information can be shared lawfully if it is to keep a child at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.

Consent

Try to get consent from parents (or the child, if they have sufficient understanding) to share information, if possible. However, information can be shared legally without consent, if one is unable to, cannot be reasonably expected to gain consent from the parent/guardian, or if to gain consent could place a child at risk. If you decide to share information without consent, you should record this with a full explanation of your decision.

Consent should not be sought from parents or carers (or the child, if they have sufficient understanding),

- if it would place a child at increased risk of harm; or
- it would place an adult at risk of serious harm; or
- it would prejudice a criminal investigation; or
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a child; or
- if required by law or a court order to share information.
Consent is not necessary in cases where Children’s Social Care are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children’s Social Care; staff members must make sure to record what information has been shared.

Consent is necessary, for:

- Children’s Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children’s Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in the Single Point of Advice.

- Early help (level 3) referrals and assessments. Assessments are undertaken with the agreement of the child and their parents or carers.

Information sharing decisions will be recorded, whether or not the decision is taken to share. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL.

See for reference DfE: ‘Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers’ July 2018.

Transfer of Child Protection and Safeguarding Files
The Admissions Registrar and the DSL are responsible for the transfer of information as students enter and leave the School and will transfer information appropriately and in accordance with due process. Children who are deregistered to be home-schooled are recorded on an Elective Home Education (EHE) form which will be sent via Babcock to the Local Authority, DCC.

Where children are on the Child Protection register and leave one school for another, the DSP will inform the receiving school and the key worker and transfer the safeguarding folder within fifteen school days from notification. If the child leaves the SDSS with no receiving school, details will be passed to the education social worker.

Record Keeping
Records will be kept of all concerns raised, disclosures made, conversations and decisions; all information recorded or gathered will be kept in a confidential Safeguarding file: The Safeguarding Evidence Folder (SEF). This is to ensure that the SDSS and children’s Services have shared clarity as to the issue or concern being raised, or advice being sought by the SDSS. A copy will be kept in the child’s safeguarding file (SEF).
Managing Allegations/Concerns about Adults in the School

Allegations of abuse against staff and volunteers will be dealt with according to the statutory guidance set out in KCSIE, part 4. Staff should also have regard to the School’s Code of Conduct to minimise the risk of allegations being made. All allegations will be taken seriously and treated as quickly as possible, in a fair and consistent manner providing effective protection for the child and at the same time supporting the person who is the subject of the allegation. Confidentiality cannot be promised to the informant.

Where there is an allegation that a member of staff or volunteer has:
1. Behaved in a way that has harmed a child or may have harmed a child
2. Possibly committed a criminal offence against or related to a child or
3. Behaved towards a child or children in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with a child

The details of the allegation should be recorded in writing, dated and signed.
- The DSL/DDSL should immediately contact the School Education Manager (SEM), in writing and the LADO who will work with the School to discuss the management of the allegation.
- In the event that the allegation is against the SEM, then the Council Chair or the Chair of College of management should be informed as well as the LADO. (KCSIE, part 4, 194)
- If the allegation is against the Director of Operations/DSL then the Deputy should be appointed DSL and SEM and the LADO are informed.
- In the event that the allegation is against a Council member the DSL will immediately inform the Chair of Council who must contact the LADO directly.
- Should the allegation be against the Chair of Council the staff member should inform the LADO without delay (advising the DSL immediately).

All allegations against staff will be reported to the LADO within 24 hours and decisions will not be made without discussion with the LADO.

School Education Manager (SEM): Jeff van Zyl
Chair of Council: Juliet Crittenden
Local Authority Designated Officer (LADO): Rosie Geis

Details of the management of the allegation are contained in Appendix 1.

Concerns about the way Safeguarding is carried out in the school

We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so. All Staff should raise concerns about the way safeguarding is managed within the School and be aware of their protection in so doing under the School’s ‘Whistleblowing policy’. Staff can seek advice from the NSPCC Whistle blowing helpline on 0800 028 0285 and can go to an appropriate person in the School to report their concern.
Role of Designated Safeguarding Lead (DSL) and Deputy Safeguarding Lead DDSL

The DSL is responsible for safeguarding and child protection at South Devon Steiner School. The key role of the DSL is to:

- Manage referrals from school staff or any others from outside the School;
- Work with external agencies and professionals on matters of safety and safeguarding;
- Undertake training;
- Raise awareness of safeguarding and child protection amongst the staff and parents;
- Ensure that child protection information is transferred to the pupil’s new school;

All staff must understand the role of the DSL. The DSL and/or the deputy DSL can be contacted at any time. Details of the DSL’s role and responsibilities are listed in Appendix 2.
Appendix 1 - Dealing with Allegations or concerns of Abuse by Teachers and other Staff or Volunteers

Reporting an allegation or concern by a member of staff
If a concern is made against a member of staff, it can be reported initially to the DSL or directly to the Trustee for Child Protection. The Trustee will work with the DSL, but will take responsibility for any action necessary. If an allegation is made against a member of staff, it has to be made in writing to the head of education, Jeff van Zyl (School Education Manager). Everyone who receives information about an allegation should take it seriously and keep an open mind as to whether it might be true. The designated trustee will generally be the ‘case manager’ and from now on will be referred to in the policy as the case manager. In exceptional circumstances, the case manager role may be delegated to the DSL; but this will be the exception rather than the rule. If the allegation concerns the trustee, then the allegation should be referred by the DSP to the chair of Trustees, if this is the designated safeguarding trustee then the enquiry needs to be made to a supporting trustee.

Assessing an allegation/concern
This guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a teacher or member of staff or volunteer in the school has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

Important Definitions determining the outcome of allegation investigations
The following definitions should be used:

- Substantiated: there is sufficient identifiable evidence to prove the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
- Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Procedure to be followed in the event of an allegation being made
DSL informed should contact the trustee for child protection and safeguarding: This is Juliet Crittenden. She will advise if she wishes the case manager to proceed on her behalf. Each case needs to have two people working together on this, one to maintain the correct safeguarding procedure and one Human Resources (HR) and legal procedure.

a) The case manager will immediately discuss the allegation with the Local Authority Designated Officer (LADO), who can be contacted on 01392 384 964/Rosie Geis 07971308305 or fill out an online referral
b) The purpose of an initial discussion is for the LADO and the designated trustee/case manager to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations and the individual’s current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

c) The case manager will inform the accused person about the allegation as soon as possible after consulting the LADO. (http://www.devonsafeguardingchildren.org/wp-content/uploads/2014/11/LADO-Guidance-Note-1.pdf) The case manager will also be in communication with the School’s legal advisor (HR advice) to ensure best practice with regards to the treatment of the employee. The case manager will provide the member of staff with as much information as possible at that time. However, where a strategy discussion is needed, or police or children’s social care services need to be involved, the case manager will not inform the accused person until those agencies have been consulted, and have agreed what information can be disclosed to the accused. Relevant representatives from the school (including the designated trustee, the DSPs and where necessary, other trustees) will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step. (Please see further information on suspension below in e) and 11.10 on page 13).

d) If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion (Info about attending a LADO strategy meeting: http://www.devonsafeguardingchildren.org/wp-content/uploads/2014/11/LADO-Guidance-Note-2.pdf) should be convened according to the government document; ‘Working together to safeguard children’. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.

e) Where it is clear that an investigation by the police or children’s social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO should discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person’s services in future. The school will also take legal advice from its own HR advisor at this stage. Suspension should not be the default
position: an individual will be suspended only if there is no reasonable alternative to find them employment away from children.

f) In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the LADO should discuss with the case manager how and by whom the investigation will be undertaken.

g) However, there may be circumstances, such as lack of appropriate resource within the school, or the nature or complexity of the allegation will require an independent investigator, or someone will be brought in from the local authority.

Procedure once an incident has occurred or an allegation has been made
Once there is awareness of an incident/allegation it is advisable, initially, to discuss the details with the Designated Senior Manager or the Designated Safeguarding Lead for the organisation and record/log the details in the relevant records.
If it is considered a LADO referral is needed, gather all relevant information, to include:

- the name, date of birth and home address of the ADULT connected to the allegation/incident
- the child’s/children’s’ details, as LADO procedures cannot begin without this information
- the name, organisation’s address and the role the reporting person has in the organisation

Once this information is available, please ring Exeter (01392) 384964. The LADO Administrator will take the details of the incident/allegation and contact the Duty LADO to pass them the details of the incident/allegation. Alternatively an online referral form can be filled out. The Duty LADO will give advice on how to proceed and/or recommend an allegations’ management strategy meeting for further investigation, which will include police consultation.

If the decision is to set up an allegations’ management strategy meeting, the LADO Administrator will send details of the meeting date, time and venue and also of the LADO Chairing the meeting, who would be proceeding with the case.

If it is considered that an incident or allegation is an emergency, and that a child/children may be in danger of immediate harm, you may wish to consider in the first instance contacting either the police on 999 or the Multi Agency Safeguarding Hub (M.A.S.H.) on 0345 155 1071 or via email mashsecure@devon.gov.uk.

Supporting those involved

a) The school has a duty of care to its employees and it will act to manage and minimise the stress inherent in the allegations process. Throughout the process, the school will consult its employment solicitor for advice to ensure best practice is followed. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children’s social care services or the police. The individual will be advised to look to a colleague for support. (What happens if an allegation is made against you? Follow the link (http://www.devonsafeguardingchildren.org/wp-content/uploads/2014/11/LADO-Guidance-Note-3.pdf)
b) The case manager will either appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case or will do so themselves. The case manager will also consider what other support might be appropriate for the individual. If a decision is taken to suspend an employee, the school will ensure that the member of staff is kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

c) Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children’s social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parent or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

d) Where possible, parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children’s social care services, or the police as appropriate, will consider what support the child or children involved may need.

Confidentiality
When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. This is in line with the Education Act 2011, which introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. These provisions commenced on 1 October 2012.

The case manager will take advice from the LADO, police and children’s social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any information can be reasonably given to the wider community to reduce speculation;
- How to manage press interest if and when it should arise.
Resignations and what, if any information, can be reasonably given to the wider community to reduce speculation

Resignations and ‘compromise agreements’
If the accused person resigns, or ceases to provide their services, the school is still obliged to follow up any allegation made according to the policy outlined above. Every effort will be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused person will be given a full opportunity to answer the allegation and make representations about it. However, the school is required to continue the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, even if that cannot be done or the accused does not cooperate. The school is unable to enter ‘compromise agreements’, with any employee against which there are allegations. This means there can be no arrangement whereby a person agrees to resign if the employer agrees not to pursue disciplinary action; nor can parties agree a form of words to be used in any future reference. Where circumstances require, the school is also required to make a referral to the Disclosure and Barring Service (DBS), formerly the Independent Safeguarding Authority (ISA).

Record keeping
Details of allegations that are found to have been malicious will be stored in private records for any future reference. However, for all other allegations, the school is required to keep a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to provide clarification in cases where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-/investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record will be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Timescales
All allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases may depend on a variety of factors including the nature, seriousness and complexity of the allegation. However, the school will endeavour to meet DfE suggested targets: 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months. For those cases where it is clear immediately that the allegation is unfounded or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Suspension
Suspension will not be an automatic response when an allegation is reported; all options to avoid suspension will be considered prior to taking that step. Suspension will be considered in a case where there is cause to suspect a child or other children at the school is/are at risk of significant harm or the case is so
Action on Conclusion of a Case

- If the allegation is substantiated and the person is dismissed or the employer ceases to use the person’s services, or the person resigns or otherwise ceases to provide his or her services, the case manager, the LADO and the Schools employment solicitor via Personnel will make a decision as to whether to refer the case to the DBS (formerly the ISA) for consideration of inclusion on the barred lists; or to refer to the Teaching Agency.
- The school is legally required to make a referral to the DBS where it thinks that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. In such circumstances, the duty to refer an individual to the DBS arises where an employer has removed the individual from relevant work with children or the person has chosen to cease relevant work in circumstances where they would have been removed had they not done so.
- The school is required to make referrals as soon as possible after the resignation or removal of the member of staff involved and within one month of ceasing to use the person’s services. The DBS will consider whether to bar the person from working in regulated activity, which will include most work in schools and other educational establishments.
- The school is required to refer cases of professional misconduct to the relevant regulatory body DfE.
- If the allegation against a staff member involves a Kindergarten (Early Years) or nursery child, then the case manager must contact Ofsted. The case manager should record their discussion with Ofsted, including the name of the person spoken to. Ofsted must also be informed in writing. See contact details in appendix 8.
- In the event of an allegation involving kindergarten/school child who is 6 years old, the school will contact both Ofsted and the DfE.
- Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that, and how to provide appropriate help and support after a stressful experience. A phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager will also
Safeguarding and Child Protection Policy

consider, in consultation with the DSL how the person’s contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

Action in respect of unsubstantiated or malicious allegations

- If an allegation is determined to be unfounded or malicious, the LADO should refer the matter to the children’s social care services to determine whether the child concerned is in need of services, or may have been abused by someone else.
- If an allegation is shown to be deliberately invented or malicious, the trustees in consultation with the class teachers should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil. In September 2010 the Crown Prosecution Service published guidance for the police on harassment under the Protection from Harassment Act 1997.

Chart for tasks to be completed in the event of allegations of abuse against a member of staff or another adult. As soon as the allegation is made, then both a manager and a DSL must work together to complete the below steps and investigate the incident; these must be completed in the order below. On the first instance the person receiving the complaint must seek and discuss with the other investigator and trigger the steps on this form. Those noted “on first day”, must be done within a few hours. All actions will be logged throughout the entire process.

If the allegation is made against a staff member, then this must be referred to the Designated Trustee, who will decide if he/she wishes to do this him/herself or to designate a manager to carry out with consultation.

<table>
<thead>
<tr>
<th>Step done on</th>
<th>Case Manager(school manager/senior staff)</th>
<th>Date completed</th>
<th>Step done on</th>
<th>DSL</th>
<th>Date completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st day</td>
<td>Speak to staff member regarding allegation &amp; ask them to wait in a place away from children</td>
<td>1st day</td>
<td>Assess the situation: Making sure the child is safe: administer 1st aid/emergency treatment where needed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1st day</td>
<td>Inform School Education Manager (SEM) also in writing</td>
<td>1st day</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1st day</td>
<td>Speak to the Trustee to assess if she/he wishes to continue or designate this case</td>
<td>1st day</td>
<td>Assess child for broken bones and/or skin</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1st day</td>
<td>Suspend the staff member on full pay pending further</td>
<td>1st day</td>
<td>Speak to the parents to notify them of the incident, ensure they</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Safeguarding and Child Protection Policy

<table>
<thead>
<tr>
<th>1st day</th>
<th>1st day</th>
<th>1st day</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Report back to the trustee</strong></td>
<td><strong>Contact LADO to provide a full report. This must be done within a few hours, discuss if suspension is sensible</strong></td>
<td><strong>Report to Ofsted where required</strong></td>
</tr>
<tr>
<td><strong>Ensure all documentation is in place for hearing</strong></td>
<td><strong>Once LADO has concluded, carry out actions from the hearing</strong></td>
<td><strong>Report to the manager/trustee on what LADO has concluded</strong></td>
</tr>
<tr>
<td><strong>Make the decision to uphold or dismiss the complaint. Act accordingly</strong></td>
<td></td>
<td><strong>Ensure final step in section 11.12 is carried out if needed</strong></td>
</tr>
</tbody>
</table>

### Notes
- investigation, unless other employment can be found (speak to DSL about LADO’s advice).
- Ensure the correspondence to alleged staff member contains all statements.
- Ensure that the staff member is told this has been reported.
- are informed of our next step which is to contact the LADO (Local Authority Designated Officer).
APPENDIX 2 – a) Role and Responsibilities of the Designated Safeguarding Lead

The role of the school's Designated Safeguarding Lead for Safeguarding children is to oversee the following tasks:

• Is a co-opted Member of the School Management Team (SMT) and a member of College of Management (extended School Management Group), who has lead responsibility for safeguarding and child protection; whilst activities and tasks can be delegated to appropriately trained Safeguarding Persons, the ultimate lead responsibility should not be delegated.

• Ensures the Safeguarding and Child Protection Policy is updated annually.

• To be alert to the specific needs of children in need, those with special educational needs (SEN) and young carers.

• Completes the annual Babcock audit.

• Is able to keep detailed, accurate, secure written records of concerns and referrals (separately from the main pupil record).

• Key adult contact person for the police in Operation Encompass

• Can be contacted via email safeguarding@steiner-south-devon.org, dsl@steiner-south-devon.org, T 01803 897 377 ext. 203 or out of hours for staff on her mobile.

• If the DSL and deputy are not available, Julie Thomas, Business Manager will act as cover during out-of-term activities.

• The full responsibilities of the DSL and [deputy/deputies] are set out in their job description.

Manage referrals
The DSL is expected to:

• Refer cases of suspected abuse to the local authority children’s social care: M.A.S.H.

• Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (liaise with Personnel).

• Refer cases where a crime may have been committed to the Police.

• Refer cases to the Channel programme where there is a radicalisation concern.

• Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.

• Act as a source of support, advice and expertise for staff.

Work with others
The designated safeguarding lead is expected to:

• Ensures that all staff, including new staff and part-time staff are familiar with the Safeguarding and Child Protection Policy and procedures.

• Liaise with the “case manager” as per Appendix 1 and the Designated Officer/s at DCC (LADO) for child protection concerns (all cases which concern a staff member)

• Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

• Makes staff aware of training courses and the latest policies on safeguarding via emails and short training sessions throughout the year in department meetings/collegiate and EduCare Level 2 online courses

• Chairs the Safeguarding group meeting, held once every half/term.
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• Liaise with the School Leadership Team (SLT) to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 (see ‘Working together to safeguard children’, July 2018, page 18) and police investigations (section 17 of the Children Act 1989 (children in need); section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm))

• Acts as a source of advice, support and expertise within SDSS.

• Meets with Trustee responsible for Safeguarding at the half-termly Safeguarding group meeting and termly for reporting.

• Provides appropriate feedback to members of staff as and when necessary.

• Ensures parents have access to copies of the Safeguarding Policy which alerts them to the fact that enquiries may be made and the role of the school in this to avoid conflict later.

Training

• Has been trained in Safeguarding Child protection and inter-agency working level 3. This training will be updated every two years (this also applies to the Deputy Designated Safeguarding Person).

• Has undertaking Prevent Duty awareness training.

• In addition to the formal training set out above, his/her knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow him/her to understand and keep up with any developments relevant to their role.

• Has a working knowledge of Local Authority procedures such as how a child protection case conference and a child protection review conference work and be able to attend and contribute to these effectively when required to do so.

• Ensure each member of staff has access to and understands the school or college’s Safeguarding and Child Protection policy and procedures, especially new and part time staff;

• Is alert to the specific needs of children in need, those with special educational needs and young carers.

• Is able to keep detailed, accurate, secure written records of concerns and referrals;

• Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

• Obtain access to resources and attend any relevant or refresher training courses;

• Encourage a culture of listening and caring for children’s wishes and feelings;

• Ensures all Trustees (through the Trustee for Safeguarding) have completed their mandatory safeguarding training

Deputy DLS will be trained to the same level as the DSL.

APPENDIX 2 – b) Responsibilities of the Trustee/s

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

Also in support of the Designated Safeguarding Lead and other members of the SG team, the Designated Trustee (on behalf of the board of trustees) has the role to ensure:
• That the DSL and DSP’s have sufficient time, support and resources to carry out their child protection duties and to offer support to be the direct contact with Social Services if for any reason the member of staff is unable to fulfil the role.
• That the school effectively monitors children who have been identified as being at risk.
• That there is an adequate and appropriate reporting system within the school, which respects confidentiality but that allows for patterns of incidents to be identified.
• That the Council of Trustees are regularly informed at Trustee meetings as to how effectively safeguarding is being held in the school and to appraise the trustees in the event of a vulnerability of which they need to be aware.
• That the Chair of the Trustee takes charge (with support from the DSL) in the event of allegations against a member of staff.

The Designated Trustee for Safeguarding is trained to at least level 3.

c) Responsibilities of the Education Manager

The Education Manager 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
• Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
• Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
• Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 1)
APPENDIX 3 - ‘SIGNIFICANT HARM’ Definition

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill treatment may include the degree and extent of physical harm, the duration and frequency of harm and neglect. Sometimes a single traumatic event may constitute significant harm e.g. physical injury. More often significant harm is a compilation of significant events, both acute and long standing, which interrupt, change, or damage the child’s physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual harm that causes impairment to the extent of constituting significant harm. Sources of information about a child being abused may come from:

- Direct disclosure from the child or young person
- Third party reports
- Perpetrator themselves
- Observations by members of staff

Signs and Indicators of Abuse & Significant Harm

The following list is not exhaustive, but may include the following:

- Sudden changes in the child’s usual mood or presentation
- Flinching and watchfulness
- Emotional withdrawal and depression
- Excessive masturbation and failing to respond to boundaries on sexual behaviour
- Fear of certain people or situations
- Unexplained injuries or those that are inconsistent with the explanations given
- Self-destructive tendencies
- Patterns of absence that are unexplained and could be in order to hide injuries
- Physical injury to areas of the body, which are not usually considered to be common sites of accidental injury
- ‘Failure to thrive’ (e.g. looks thin, unwell, below average height and weight)
- Poor personal hygiene
- Reluctant to go home
- Poor social relationships
- Going missing from school
Types of abuse and neglect:

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

**Possible signs of physical abuse**
Children regularly collect bumps and bruises in the course of their everyday play or social interaction, but it doesn’t mean that they are being abused. All injuries need to be considered in the light of the age of the child, their stage of development, their social background, where injuries are on their body and any explanation given.

Physical signs may include:
- Finger mark bruising on any area of the body where bruises are unlikely to appear in everyday play
- Presence of injuries that are in several stages of healing suggesting that a child has experienced repeated maltreatment over time
- Injuries to the soles of the feet
- Bald patches on a child’s head
- Injuries that form a shape or pattern
- Scald marks and burning, including cigarette marks
- Black eyes, broken bones, bite marks
- Marks that might indicate a child has been restrained or strangled
- Injuries that are inconsistent with the explanation given
- Bruising to babies that are immobile because they are yet to reach the developmental milestone where they can sit without support, roll over, crawl or shuffle.

Behavioural signs include:
- Flinching when touched
- Inability to recall how injuries occurred
- Avoiding getting changed for sport or other activities
- Wearing heavy clothing even on hot sunny days, although remember to consider this in the light of the individual child (e.g. some children are dressed modestly for religious and/or cultural reasons)
- Reluctance to go home
- Excessively eager to please
- Being aggressive or withdrawn
Emotional abuse

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

Emotional abuse may involve:

- rejecting or ignoring a child completely
- using degrading language or behaviours towards them
- responding to their attempts to interact with emotional detachment
- making fun of them
- threatening them or encouraging them to develop behaviours that are self-destructive
- preventing the child from interacting socially with other children or adults
- a child seeing or hearing the ill treatment or serious bullying (including cyberbullying) of another
- causing children to feel frequently frightened or in danger
- the exploitation or corruption of children.

Emotional abuse also includes radicalising a child or young person who may be subsequently drawn into extremism or terrorist-related activity. Young people may also experience emotional abuse through their peers. Peer-on-peer abuse can be face-to-face or online, by an individual or by a group.

Possible signs of emotional abuse

Physical signs may include:
- self-harm marks
- erratic behaviour
- delayed development, either physically or emotionally
- erratic weight or growth patterns.

Behavioural signs may include:
- difficulty in forming relationships
- inappropriate attention-seeking
- withdrawn
- unexplained underachievement at school
- self-harm
- bed-wetting
- disturbed sleep.
Sexual abuse
Sexual abuse involves someone forcing or enticing a child 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. In fact, the majority of children who are sexually abused will have no visible signs at all, due to the attacker not wanting to leave evidence, amongst many other reasons in the grooming process. Sexual abuse is not solely perpetrated by adult males. Though less common, women can also commit acts of sexual abuse, as can other children.

Sexual activities may involve physical contact, including:
- assault by penetration
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- It may also include non-contact activities, such as:
  - watching sexual activities
  - encouraging children to behave in sexually inappropriate ways
  - inappropriate role play
  - involving children in looking at, or in the production of, sexual images
  - grooming a child in preparation for abuse (including via the internet).

Possible signs of sexual abuse

Physical signs include:
- stomach pains
- genital soreness, bleeding or discharge
- recurring genital-urinary infections
- discomfort in walking or sitting
- sexually transmitted infections.

Behavioural signs may include:
- a change in behaviour
- not wanting to undress
- sexual knowledge, language and behaviours beyond their age
- self-harming
- fear or avoidance of being with a person or a group of people
- being withdrawn
- unexplained amounts of money or gifts
- disturbed sleep
- sexualised drawings.

Neglect
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 misuse.

The information in this section was current in August 2018.
Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing or 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
- respond to a child’s basic emotional needs.

Physical signs include:
- unattended medical or dental problems
- lack of energy due to inadequate food intake and/or poor nutrition
- poor personal hygiene/unwashed clothing
- inadequate clothing (not having warm clothes in winter)
- untreated skin or hair problems (rashes, sores, flea bites, head lice)
- very thin or swollen stomach
- constantly hungry
- lack of muscle tone (bones appearing to stick out)
- constant tiredness.

Behavioural signs may include:
- demanding constant attention and affection
- difficulty in making friends
- missing or irregularly attending school or nursery
- frequent lateness
- stealing or begging food from others
- emotional withdrawal
- lack of aspirations
- low self-esteem
- poor social relationships
- alcohol or substance misuse
- developmental delay (weight, language, social skills).

**Domestic Violence and Abuse**
The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional
Controlling behaviour: Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour: Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. *Note: This is not a legal definition.*
Appendix 5 - Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi Agency Practice Guidelines (Multi-agency statutory guidance, April 2016). Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

**Mandatory Reporting Duty for FGM** Section 5B of the *Female Genital Mutilation Act 2003* (as inserted by section 74 of the *Serious Crime Act 2015*) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions and will be dealt with in accordance with existing performance.

It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty will commence in October 2015. From this date teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s Designated Safeguarding Lead (DSL) and involve children’s social care as appropriate.

1 **Visually identified cases of FGM**
   Whilst it is very unlikely that the teachers of older children will see cases and they certainly should not be examining pupils. It may be the case in the younger kindergarten and nursery children. Whilst the staff members are toileting young children, or changing nappies they may note something that appears to show the FGM has taken place. At this point, the staff member must make a report, however, must not conduct any further examination of the child.

2 **Verbally disclosed cases of FGM**
   The duty to report applies to cases directly disclosed by the victim, if a girl discloses to you that she has had FGM or uses a term, such as ‘cut’ then the duty applies.

If a parent, guardian or sibling or other person makes a disclosure, then the report should be made to children's social care.
3 Time frame and procedure for reports
The duty to disclose is to be made imminently after a case is discovered, best practice is by the close of the next working day. These reports must be made to the police on phone number 101, the legislation requires you to identify the child and explain why the report is being made. Whilst the requirement to notify the police of this information is mandatory and overrides any restriction on disclosure which might otherwise apply.

- call 101 ask to be connected to Devon and Cornwall Police
- explain you are making a report under the FGM mandatory reporting duty
- give your details, role, contact number and place of work
- give details of your safeguarding lead
- give the girl’s details, her name, age/date of birth and address
- keep a reference number of the call and make notes throughout

Accurate records must be kept.

4 Informing the child’s family
In line with best safeguarding practice you should contact the child’s parent/s or guardians as appropriate to explain the report, why it is being made and what it means. Wherever possible you should have this discussion in advance of/in parallel with the report being made. However, if you believe that telling the child/parents about the report may result in the risk of serious harm to the child or anyone else, or the family fleeing the country you should not discuss this.

While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, and areas of the Middle East like Iraq and Yemen, it has also been documented in communities in:

- Colombia, Iran, Israel (within the Bedouin community and within the immigrant Ethiopian Jewish community in its country of origin), Oman, The United Arab Emirates, The Occupied Palestinian Territories.

Please see the HM Government: Multi-agency statutory guidance on female genital mutilation, April 2016.

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Appendix 6 - Children Missing from Education

All children regardless of circumstances are entitled to a full time education. Local authorities have a duty to establish, as far as it is possible to do so, the identity of compulsory school age children who are missing education. A child missing from education is a potential indicator of abuse of neglect. School staff should follow the procedure below on children missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent risks and their going missing in future. School registers are our way of assisting to monitor this, along with increased vigilance - these 'missing' children can be vulnerable; it is essential that all services work together to identify, locate and re-engage these children back into appropriate education provision as quickly as possible. It is important to establish the reasons for a child/young person being missing at the earliest possible stage. Possible reasons for children coming under this guidance that should be considered include:

- Failure to start appropriate provision and never enter the system;
- Stopped attending, due to illegal exclusion or withdrawal by parent/carers;
- Failure to complete a transition between schools;
- Children from refugee and asylum seeking families;
- Children from families who are highly mobile;
- Children at risk of a forced marriage;
- Children experiencing abuse and neglect.

Children who remain disengaged from education are potentially exposed to higher degrees of risk such as antisocial behaviour, running away from home and/or sexual exploitation. The case at point is that the whereabouts of these children should be tracked to ensure they reach their destination and that this is recorded accurately. Those children that do not have a destination clearly need to be followed up.

In line with KCSIE 2019 the school has:

- what to do when children do not attend regularly
- appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

If a child fails to attend school regularly or has been absent without the schools permission for a continuous period of 10 school days or more, the local authority MUST be informed.

If you have a concern about a child missing from education you should:

- Collate all the dates from your register
- Speak to the DSL, with these dates and concerns, in writing

The DSL must then:
1) Contact the Education Welfare Service Devon;
   T 0345 155 1015 (My Devon)
Procedures to inform the local authority when it is planned to take pupils off-roll when they

1. Leave school to be home educated
2. Move away from the School’s location
3. Remain medically unfit beyond compulsory school age
4. Are permanently excluded
5. Are in custody for four months or more (and will not return to school afterwards)

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. In some circumstances, one instance of which is mentioned on the previous page, the School has a legal duty to report absences to the Local Authority.

See Attendance and Lateness policy and please refer to ‘Children missing education’, statutory guidance for local authorities September 2016.
Appendix 7 – Allegations and Disclosure of Peer-on-Peer Abuse

At our school we believe that all children have a right to attend and learn in a safe environment. Children should be free from harm by adults in the school and other children. Peer on peer abuse does not occur in a vacuum, it occurs in a society where there are structures and norms that shape young people’s views, experiences and behaviours, as well as responses to them. Gender can be a factor within peer on peer abuse, in that it is more likely that girls will be victims and boys perpetrators.

All peer on peer abuse is unacceptable and will be taken seriously, it will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. There are different forms of peer on peer abuse, such as:

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexting (also known as youth produced sexual imagery).
- Sexual violence and sexual harassment.
- Upskirting (see definition page 13).
- Initiation/hazing type violence and rituals.

All reports of peer on peer abuse will be reported to the DSL and recorded on the safeguarding files for each child involved. The DSL will analyse the information and take action as necessary and record the outcome.

In the case of physical abuse consideration will be given as to whether it may be appropriate for the school to make use of the behaviour or anti bullying policy and processes to resolve the issue.

In the case of sexting the school will follow the UK Council for Child Internet Safety (UKCCIS) advice for schools and colleges on responding to sexting incidents. Based upon this, when determining a response the school will consider:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children’s social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery will not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people 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 will be involved
The school will always make a referral to the 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 is known about the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

In the case of sexual violence or sexual harassment:

- The school recognise that reports of this nature are likely to be complex.
- All decisions will be made on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or school or college staff; and
- Other related issues and wider context.

Initiation/hazing type violence and rituals are likely to be complex and may involve a range of behaviours. The school will manage reports of such activity on a case by case basis applying the same principles and considerations as outlined above for other types of peer on peer abuse.
Referrals to other agencies

- Any report which involves activity which is suspected of being a crime: the school will refer to the police.
- Any report which involves activity which places a child at level 3 or 4 on the continuum of need: the school will refer to children’s social care.
- The school will give consideration to what other agencies or resource might be of support to children and families, seeking consent and making referrals as necessary.

Responding to reports of peer on peer abuse

All victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

When being made aware of a disclosure or report of peer on peer abuse all staff will:

- Not promise confidentiality
- Be supportive and respectful of the child;
- Listen carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.;
- Record the facts as the child presents them, without reflecting the personal opinion of the note taker as such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
- If possible, have two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
Safeguarding and Child Protection Policy

Procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger). If the DLS is unavailable, this should not delay action.

- You have concerns about a child
  - Speak to the DSL
    - Referral not required. School takes relevant action and monitors locally
      - If concerns escalate, make a referral
    - You or the DSL make a referral to the LA’s social care team (and call the police if appropriate)
      - Within 1 working day, a social worker makes a decision about the type of response required
        - LA’s social care team takes action and informs the referrer
          - No formal assessment required
            - School considers early help assessment and accesses other support as appropriate
              - Staff keep the child’s circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child’s best interest must always come first at all stages.
Appendix 9 - Information/Advice/Guidance

Useful contact list:

Chair of Council/Trustee for SG & CP/Governor: Juliet Crittenden
Designated Safeguarding Lead/Member of College of Management, Key Adult Operation Encompass: Gaby Wood
Deputy Safeguarding Lead, School Education Manager/headteacher: Jeff van Zyl
Designated Safeguarding Person: Karola Hassall, Simon Berkley & Elizabeth Elsholtz

MASH (Multi-Agency-Safeguarding-Hub), mashsecure@devon.gov.uk 03451 551 071
MASH Emergency Duty Team – out of hours 0845 600 0388
LADO (Local Authority Designated Officers), Exeter 01392 384 964
LADO: Rosie Geis’ mobile 07971 308 305
ladosecure-mailbox@devon.gov.uk
Early Help Coordinator Centre, earlyhelpsouthsecure-mailbox@devon.gov.uk 0345 155 1071
Early Help Locality Officer - South: Jan Mead jan.mead@devon.gov.uk 07891 417 073
Early Help Locality Officer – South: Jane McCardle: jane.mcardle@devon.gov.uk 07970 120 791
Early Help Operations Manager: Karen Hayes: Karen.Hayes@devon.gov.uk 07854 253 424
NSPCC, www.nspcc.org.uk 08088 005 000
Childline, childline.org.uk
Bullying, www.bullying.co.uk 0800 1111

Devon and Cornwall Police 111(101 for FGM)
Emergency 999
Police Community Officer for TQ9 6AB: PCSO Russell Broadhurst
DCC Prevent Officer: Simon Kitchen

Inspection body: Ofsted (Office for Standards in Education Children’s Services and Skills)
General enquiries: T0300 123 1231 or email enquiries@ofsted.gov.uk

If you have concerns about how child protection issues are being handled in your organisation then you can contact the Whistleblowing Advice Line which offers free advice and support on 0800 028 0285 or Email help@nspcc.org.uk.
Compliance – Safeguarding Legislation and Guidance

- 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
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- Section 11 of the Children’s Act 2004
- Section 157 of the Education Act 2002
- Section 141F Education Act 2011
- Section 17(10) Children’s Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Protection from Harassment Act 1997
- 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
- The Safeguarding Vulnerable Groups Act 2006
- ‘Working together to safeguard children’, A guide to inter-agency working to safeguard and promote the welfare of children, July 2018
- ‘Keeping Children Safe in Education’, Statutory guidance for schools and colleges September 2019
- ‘Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers’ July 2018.
- Child sexual exploitation, Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation, February 2017, DfE
- ‘Sexual violence and sexual harassment between children in schools and colleges’, May 2018, DfE
- 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.
- ‘The Rehabilitation of Offenders Act 1974’, which outlines when people with criminal convictions can work with children
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
SDSS Policy References – available on our website

- Safer Recruitment Policy
- Anti-Radicalisation Policy (Prevent Policy) and Staff Guidance
- Anti-Bullying Policy
- Cyber-Bullying Policy
- Social Media & E-safety Policy
- Whistleblowing Policy
- Staff Code of Conduct Policy
- Staff Contact Policy
- Parental Contact Policy
- Data Protection & Information Sharing Policy
- Boarding Policy
- Mobile Camera, Phone & ICT Devices Policy
- ICT AUP Policy (including BYOD)
- SEND Policy
- Behaviour Policies for: class 1-3, 4-8, & 9-12
- Attendance & Lateness Policy