

**THE CITY OF ROCHESTER SCHOOL**  
**SAFEGUARDING CHILDREN - CHILD PROTECTION POLICY**

*This policy which applies to the whole school is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.*

**Safeguarding is the golden thread that runs throughout every aspect of the school. All our school policies support this policy.**

Safeguarding is everyone's responsibility. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. All employees and volunteers are required to sign that they read, understood and will abide with our Child Protection Policy, 'KCSIE Part 1 inclusive of Annex A' along with our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour Policy (Staff Code of Conduct), and The Teachers' Standards. This policy takes full account of the child protection procedures agreed by the [Medway Safeguarding Children Partnership](#), alongside the [Kent Safeguarding Children Partnership](#), as a number of our pupils come from this local authority.

We will always act in the best interests of the child. The City of Rochester School recognises it is an agent of referral and not of investigation. Any person may make a referral (including whistleblowing) to external agencies such as the *Local Authority Designated Officer (LADO) and the police, if necessary*. The City of Rochester School also allows access for children's social care from the host local authority and, from the local authorities where the children reside in undertaking their safeguarding (Child Protections) duties.

**Monitoring and review:** This policy is subject to continuous monitoring, refinement and audit by Alicja Emmett (Headteacher) who is the Deputy Designated Safeguarding Lead (DDSL) and Michelle Homer who is the Designated Safeguarding Lead and Kelly Lovell (Assistant Head) and Alison Barton (School Wellbeing) who are also Deputy DSL's. The Trustees will undertake a full annual review of this policy and its procedures, inclusive of the implementation and efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. The Trustees recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. As such, staff have the opportunity to contribute to and shape our safeguarding arrangements and child protection policy. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed policy and it is made available to them in either a hard copy or electronically on the *staff share drive*.

This policy was last reviewed and agreed by the Board of Trustees at the school in September 2020 and will next be reviewed no later than September 2021 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed:

Date Reviewed: March 2021

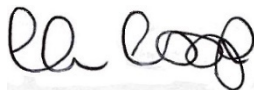
Date of Next Review: September 2021

Version No. 5

Policy No. 19a.001



Alicja Emmett  
Headteacher



Claire Cooper  
Chair of Trustees and Safeguarding Trustee

Our school has a board of trustees who are the proprietor. The trustees have ensured that a member of the senior leadership team, appointed as designated safeguarding lead (DSL), is able to discharge that role with sufficient independence.

**This is a core policy that forms part of the induction for all staff.**

It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. In addition, all staff are provided with Part One of the statutory guidance '[Keeping Children Safe in Education](#)', DfE (2020).

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*The City of Rochester School is committed to safeguarding and promoting the welfare of our students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential*

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## What to do if you have a welfare concern in City of Rochester School

### Why are you concerned?

- For example
  - Allegation/ child shares a concern or worry
  - Indicators of abuse or neglect

### Immediately record your concerns

- Follow the schools procedure recording on CPOMS
- Reassure the child
- Clarify concerns if necessary (**T**ED: **T**ell, **E**xplain, **D**escribe)
- Use child's own words
- Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead Michelle Homer 01634 570706  
[michelle.homer@cityofrochesterschool.org](mailto:michelle.homer@cityofrochesterschool.org)

### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the MSCP [Inter-Agency Threshold Criteria for Children in Need](#) for further guidance.
- If the child is **at imminent risk of harm** a referral will be made to First Response – 01634 334466
- If the child is **NOT** at imminent risk then a referral will be made via [\(the portal\)](#)
- If unsure then consult with First Response 'No Name Consultation line' 9:30 – 12:30 (01634 33 1662) or First Response on 01634 33 4466

### If you are unhappy with the response

#### Staff:

- Follow local escalation procedures
- Follow Whistleblowing procedures

#### Pupils and Parents:

- Follow school complaints procedures

Record decision making and action taken in the pupil's Child Protection/safeguarding file

### Monitor - Be clear about:

- What action you have taken at the time of reporting the concerns.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary)

At all stages the child's circumstances will be kept under review  
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**

*The City of Rochester School is committed to safeguarding and promoting the welfare of our students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential*

## 1. Introduction and Ethos

- **City of Rochester School** is a community and all those directly connected (staff, volunteers, trustees, parents, families and pupils) have an essential role to play in making it safe and secure. **City of Rochester School** recognises our statutory responsibility to safeguard and promote the welfare of all children.
- **City of Rochester School** recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly.
- Through their day-to-day contact with pupils and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse or neglect at an early stage. Our school may be the only secure, stable and predictable element in their lives.

**City of Rochester School** will endeavour to support the welfare and safety of all students through:

- Ensuring that the child's welfare is of paramount importance.
- Protecting children and young people at our school from maltreatment and exploitation.
- Ensuring that children's mental and physical health or development is not impaired.
- Ensuring all staff are able to recognise the signs and symptoms of abuse and are aware of the school's procedures and lines of communication.
- Ensuring that children and young people at our school grow up in circumstances consistent with the provisions of safe and effective care.
- Providing children a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) to help students stay safe, recognise when they don't feel safe and identify who they might / can talk to.
- Work with parents to ensure that parents understand the school's responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations.
- Monitoring children and young people who have been identified as having welfare or protection concerns; keeping confidential records which are stored securely and shared appropriately with other professionals.
- As a school we ensure all staff have the knowledge and understanding to embed safeguarding through systems so that safeguarding is a robust element of our school.
- Ensuring all steps are taken to maintain site security and students' physical safety
- The voice of the child is evident in case files and informs schools policy developments.
- Ensuring that the school practises safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors/contractors and parents and informing them about expected behaviour and our legal responsibility to safeguard and promote the welfare of all our children at our school.
- Working with a commitment to safeguarding/child protection in a multi-agency environment and developing effective and supportive co-operation with other agencies.

**This policy should be read in conjunction with:**

- [‘Keeping children safe in education’ \(revised for September 2020\)](#) – statutory guidance for schools and colleges from the Department for Education, setting out the responsibilities placed on schools and colleges to safeguard and promote the welfare of children.

- [‘Working together to safeguard children’ 2018](#) – this statutory guidance for organisations and professionals who provide services to children was revised in 2018 to reflect multi-agency safeguarding arrangement
- [“What to do if worried a child is being abused” \(March 2015\)](#) - Guidance to help practitioners identify the signs of child abuse and neglect and understand what action to take.
- [‘Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#) this advice is for practitioners and senior managers. It helps them decide when and how to share personal information legally and professionally.
- [Section 175 of the Education Act 2002](#) requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

## 2. Definition of Safeguarding

- ‘Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is **child-centred**. This means that they should consider, at all times, what is in the **best interests** of the child. (*Keeping Children Safe in Education September 2020*)

Safeguarding children is defined in [Keeping Children Safe in Education 2020](#) as:

- protecting children from maltreatment
  - preventing impairment of children’s mental and physical health or development
  - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes
- All relevant policies will be reviewed on an annual basis by the Trustees who have responsibility for oversight of school safeguarding and child protection systems.
  - The Designated Safeguarding Leads / Headteacher will ensure regular reporting on safeguarding activity and systems in school to the Trustees. The Trustees will not receive details of individual student situations or identifying features of families as part of their oversight.
  - The Designated Safeguarding Leads/ Headteacher will ensure they consider the potential criminal aspects of child protection concerns and seek consultation with the police in addition to following local safeguarding procedures. **For further guidance see Annex 5.**

## 3. Key Responsibilities

- The Trustees and all staff have read and will follow [Keeping Children Safe in Education 2020](#).
- **City of Rochester School** has a nominated trustee for safeguarding, **Claire Cooper** will take the lead role in ensuring that the school has an effective policy which interlinks with other related policies; that locally

agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

- The Trustees, Headteacher and Leadership Team will ensure that the DSL is suitably supported in their role and ensures that the DSL understands they have the responsibility in leading safeguarding and child protection across the school.
- The Trustees should ensure that the DSL has the appropriate status, authority, funding, resources, training and support to provide advice and guidance to all staff members within the school on child welfare and child protection. The Designated Safeguarding Lead/Deputy Designated Safeguarding Lead receives appropriate and regular supervision from the senior leadership team or external services.

### 3.1 Designated Safeguarding Lead (DSL)

**Our School's Designated Safeguarding Lead (DSL) and the Deputy DSL**, who are members of the Senior Leadership Team (SLT), have lead responsibility for child protection and are also the Prevent Officer and Deputy Prevent Officer responsible for the prevention of radicalisation, extremism and being drawn into terrorism. Their telephone numbers are prominently displayed in the school. The City of Rochester School's DSL and Deputy DSL are:

**Designated Safeguarding Lead (DSL), Prevent Officer for the whole school and Designated Teacher for Children in Care (Looked after Children)** Michelle Homer who is the Deputy Head

Telephone number: 01634 570706 and 07947 144640 (Out of school hours:)

Email address: [michelle.homer@cityofrochesterschool.org](mailto:michelle.homer@cityofrochesterschool.org)



**Deputy Designated Safeguarding Lead (DSL)**

Kelly Lovell who is the Assistant Head – Pastoral and Welfare

Telephone number: 01634 570706

Email address: [kelly.lovell@cityofrochesterschool.org](mailto:kelly.lovell@cityofrochesterschool.org)

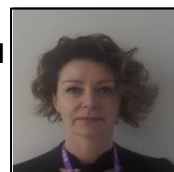


**Deputy Designated Safeguarding Lead (DSL) and Deputy Prevent Officer for the whole school**

Alicja Emmett who is the Headteacher

Telephone number: 01634 570706

Email address: [alicja.emmett@cityofrochesterschool.org](mailto:alicja.emmett@cityofrochesterschool.org)

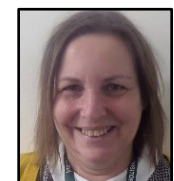


**Deputy Designated Safeguarding Lead (Deputy DSL)**

Alison Barton who is Pupil Well Being and Behaviour Support Co-Ordinator

Telephone number: 01634 570706

Email address: [alison.barton@cityofrochesterschool.org](mailto:alison.barton@cityofrochesterschool.org)



**Nominated Trustee for Safeguarding and the Prevent Duty**

In our school the Trustee for Child Protection is Claire Cooper (Chair of Trustees)

Telephone number: 01634 570706

Email address: [claire.cooper@cityofrochesterschool.org](mailto:claire.cooper@cityofrochesterschool.org)



**It is the role of the DSL to:**

- Be the main contact point for all school staff to discuss any safeguarding concerned.
- Manage and maintain the confidential paper/electronic case management systems to record cause for concerns on students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
- Coordinate safeguarding action for individual children

- In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
- To liaise with safeguarding partners, other agencies and staff in line with Working together to Safeguard Children 2018.
- Ensure that Medway referral procedures are followed as necessary (see referral process page 2).
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- As required represent and liaise appropriately with other professionals and ensure the school is represented at multi agency safeguarding meetings (including child protection conferences).
- Ensure all staff has access to and understand this school's child protection policy and procedures especially new, part time and supply staff.
- Help promote educational outcomes of 'vulnerable' children by sharing information about welfare, safeguarding and child protection issues with teachers and leaders. Have a particular focus on children with social workers.
- Ensure that staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- Support teaching staff to identify challenges they may face and the academic support and adjustments that could be made
- Act as a source of support, advice and expertise for all staff during term time (during school hours) for staff in the school to be able to discuss any safeguarding concerns.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within [Keeping Children Safe in Education 2020](#)

### 3.2 Members of Staff

- **All members of staff have a responsibility to:**
  - Provide a safe environment in which children can learn.
  - Maintain an attitude of '**it could happen here**' where safeguarding is concerned and to always act in the best interests of the child
  - Know the names of the DSL team and understand their role
  - Have read and understood part one of [Keeping Children Safe in Education 2020](#)
  - Identify and recognise children who may be in need of early help, who are suffering, or are likely to suffer significant harm
  - Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.
  - Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
  - Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - All members of staff at **City of Rochester School** know what to do if a child tells them he/she is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaise with relevant professionals such as the DSL and other agencies.
  - In order to protect confidentiality, safeguarding information about individual children is shared on a need to know basis only.
  - Understand and comply with this policy and understand other safeguarding policies and systems.
  - To undertake regular and appropriate training which is regularly updated.

- Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the school safeguarding regime. (this may include accessing the school whistleblowing policy)

### 3.3 Children and Young People

- **Children and young people (pupils) have a right to:**
  - Contribute to the development of school safeguarding policies.
  - Seek help from a trusted adult and feel listened to.
  - Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

### 3.4 Parents and Carers

#### **Parents/carers have a responsibility to:**

- Work in partnership with the school to safeguard and promote the welfare of child/ren and understand **City of Rochester School** statutory responsibilities in this area.
- Read and adhere to the relevant school/policies and procedures.
- Talk to their children about safeguarding issues with their children & support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm.
- Seek help and support from the school, or other appropriate agencies.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child/ren.

**The welfare and safety of children however are the responsibility of all staff in school and ANY concern for a student's welfare MUST be reported to the Designated Safeguarding Lead.**

## 4. Recognition and Types of Abuse and Neglect

- As a school we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another for further guidance: [Responding to Abuse and Neglect](#)
- Staff working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).



- All staff in school should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
  - **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
  - **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.
  - **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
  - **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

**The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to [Part 1 Keeping Children Safe in Education 2020](#) and [What to do if you are worried a child is being abused 2018](#).**

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.
- All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. **Extra-familial harms** take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. **Further information on Contextual safeguarding can be found in Appendix 4 of this document.**
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviours for a younger child might be normal for an older child.
- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## 5. Specific Safeguarding Issues

- **City of Rochester School** is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. The categories/issues

that follow are by no means an exhaustive list but gives an indication of the current themes in safeguarding and protecting children.

### 5.1 Peer on Peer / Child on Child

- **City of Rochester School** recognizes that children are capable of abusing other children. This referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.
- **City of Rochester School** will not tolerate, dismiss or minimize any harmful behaviours in school and will take swift action to intervene when this occurs. Any incidents of peer on peer abuse will be managed in the same way as any other child protection concern and in accordance with the Medway Safeguarding Children's partnership procedures.
- The school will follow the guidance [Sexual violence and sexual harassment between children in schools and colleges 2018](#) and [Keeping Children Safe in Education 2020](#)
- The school will respond to cases of "sexting" (or Youth Produced Sexual Imagery) in line with the UKCCIS ["Sexting in Schools and Colleges"](#) guidance.
- Further information in relation to the schools approach to "sexting" can be found in the school Online Safety Policy and Sexting Guidance.
- The school will take steps to ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of peer on peer abuse. We will also ensure that children recognise warning signs and supports of support both within the school and externally (such as Kent Police, ChildLine etc.).

### 5.2 Mental Health

- **City of Rochester School** will ensure that all staff have an awareness of mental health problems and be aware in some cases, that it can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour suggestive of a mental health problem or being at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

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

- **City of Rochester School** recognises both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- 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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator
- The abuse 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. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. **More information including definitions and indicators are included in Annex A in [Keeping Children safe in Education 2020](#).**
- Sexual exploitation can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the [CSE – Toolkit Kent and Medway](#) and [the MSCP Risk Assessment tool for sexually active young people](#).
- Criminal exploitation of young and vulnerable people is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace this is commonly referred to as cuckooing. Cuckooing is a term used to describe a **form of crime in which drug dealers take over the home of a vulnerable person** in order to use it as a base for storing or dealing drugs. (UK government definition - [Criminal Exploitation of children and vulnerable adults: County Lines guidance 2020](#))
- Where an exploitation concern has been identified, the form linked below is to be used to provide intelligence to the police in order to get a better understanding of local exploitation concerns and issues.
  - Through this portal you can report **Perpetrators** of child exploitation, **Places and Spaces** where Child Exploitation is suspected of taking place and **vehicles** believed to be connected to be exploiting children. Please use the link to - [Report an Exploitation Concern Online](#).

*This is for Child Exploitation specifically. But for general vulnerability concerns, they still need to be reported directly to the police in the usual way (101 or 999).*

**[Please note, this portal is also not suitable for reporting crime as is not monitored 24/7.](#)**

- Should we have reason to believe a student has become involved in this activity we will make referrals to First Response in Children's Social Care and the police.

***Keeping Children Safe in Education 2020 have updated their policy to include ‘Serious violence’. Specific guidance has been added to support schools where pupils may be at risk from serious violent crime***

#### **5.4 Serious Violence**

- All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs
- All staff should be aware of the associated risks and understand the measures in place to measure these. Advice for schools and colleges is provided in the Home Office’s [Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance](#).

#### **5.5 Children Missing Education (CME)**

- All staff should be aware that children going missing, **particularly repeatedly**, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- **City of Rochester School** recognises that, when a child is not in school, children may be vulnerable to or exposed to other risks, so we work with parents and other partners to keep children in school whenever possible.
- Staff should be aware of their school’s unauthorised absence and children missing from education procedures.

#### **5.6 Domestic Abuse**

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people and witnessing domestic abuse is child abuse. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.
- **City of Rochester School** recognises that Domestic abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional abuse.
- 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.
- Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: [Medway Domestic Abuse Service](#) and <http://www.safelives.org.uk>

- **City of Rochester School** recognises Operation Encompass importance in connecting the police with schools to ensure better outcomes for children who are subject or witness to police attended incidents of domestic abuse.
- All staff know what Operation Encompass is and there is a clear process for managing notifications in school (including cover if a named individual is absent).

## 5.7 So-called ‘honour-based’ abuse

- So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators.
- All staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a **mandatory reporting duty** placed on **teachers** that requires a different approach (see following section).

## 5.8 Female Genital Mutilation (FGM):

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon **teachers**, along with other 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. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students.
- The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty [FGM Fact Sheet](#)
- Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s Designated Safeguarding Lead (or deputy) and involve children’s social care as appropriate.

- If you have identified someone who has undergone or is at risk of FGM please refer to [Kent and Medway procedures](#) and follow the flowchart on page 16 which will provide you with appropriate advice and guidance dependent on the incident.

### 5.9 Forced Marriage

- Forcing a person into a marriage is a crime in England and Wales. Forced marriages occur when either or both participants have been pressured into entering matrimony, without giving their free consent. It's not the same as an arranged marriage, which may have been set up by a relative or friend, and has been willingly agreed to by the couple.
- **City of Rochester School** recognise that some communities use religion and culture as a way to coerce a person into marriage. Sometimes violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.
- The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

### 5.10 Breast Ironing

- Breast flattening is a form of child abuse. See the CPS legal guidance on [Child Abuse](#)
- Breast Ironing is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education
- There are potentially significant physical and psychological consequences and risks related to this practice. Breast flattening is a form of child abuse. Therefore professionals must follow their Local Safeguarding Children's Board Procedures.

### 5.11 Preventing Radicalisation

- The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.
- Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- There is evidence to suggest that some autistic people engage with digital technologies and social media to significant degree as a response to differences around communication and interaction in

social situations. This may increase a person's likelihood of coming into contact with online extremist propaganda and other conspiracy theories that extremist groups seek to exploit and increase opportunities for young people to become radicalised.

- The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.
- Every member of staff at **City of Rochester School** recognises that children exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting children from other risks.
- All staff and governors should complete the [Prevent online Awareness training](#) package developed by the Home Office which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process.
- Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.
- An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#).

## 6 Safeguarding and Child Protection

- **City of Rochester School** adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>
- If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 2 for a flow chart setting out the process for staff when they have concerns about a child.
- If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to First Response 01634 334466 and/or the police. If it is an emergency the police need to be called on 999.
- **If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.**
- **Less urgent concerns or requests for support will be referred to Children's social care and Early Help via the Medway online form ([the portal](#))**
- Once staff have spoken to the DSL the options the DSL will take will then include:
  - managing any support for the child internally via the school's own pastoral support processes;
  - an Early Help Assessment or
  - Make a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.
  - All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record.

- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wherever possible the school will share safeguarding concerns, or the intention to refer a child to Children’s social care, with parents or carers. **However staff will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation.** On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.
- If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the consultation from the **‘No Name’ consultation line in First Response (9:30-12:30) on 01634 33 1662.** If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.
- Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school’s escalation process.
- If a child’s situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
- If there are concerns regarding the decision making for a child by any agency then the [MSCP escalation procedures](#) can be used to explore the concerns and consider agency practice and action.
- All members of staff are made aware of the internal and local Early Help support services. Where a child is being offered or receiving Early Help support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to the First Response if the situation does not appear to be improving or is getting worse.
- **The child’s wishes**
  - Where there is a safeguarding concern, Governing Bodies, proprietors and school leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide.
  - Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best** interests of the child at their heart. **However this should not prevent safeguarding action being taken, for the child or children involved.**

## 7 Record Keeping

- Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.



- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy).
- Staff will record any welfare concern that they have about a child on the school's safeguarding system, CPOMs and alert them without delay to the DSL. Records will be completed as soon as possible after the incident/event, using the child's words by the member of staff who witnessed the incident/event.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- The DSL will keep the Headteacher informed of any significant issues.

### 7.1 Child protection file

- Where children leave the school or college the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives
- If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person to ensure there is effective transition and handover of information.
- Child protection files should always be kept by the current education setting which the child attends. Transferring settings do not need to keep copies of child protection files, but if there is reason to they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.

## 8 Multi-agency Working

- **City of Rochester School** identifies that they have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018. It is

especially important that schools and colleges understand their role in the new safeguarding partner arrangements. See <https://www.medway.gov.uk/mscb/> for further information.

- **City of Rochester School** recognises and is committed to its responsibility to work with other professionals and agencies both to ensure children's needs are met and to protect them from harm. We will endeavor to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.
- Schools are not the investigating agency when there are child protection concerns, we will however contribute to the investigation and assessment processes as required.
- **City of Rochester School** recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.
- City of Rochester School identifies the importance of a good working relationship between agencies but sometimes there may be a difference of professional views. The safety of children is the priority consideration in any professional disagreement.
- MSCP have an [Escalation Policy](#) which gives clear routes to escalate concerns so agencies can agree a way forward.

Professionals should use the [Escalation Policy](#) if they have concerns about decisions made by other professionals or agencies that may be getting in the way of keeping a child safe.

## 9 Confidentiality and Information Sharing

- **City of Rochester School** expect all staff to treat information they receive about a children and young people in a discreet and confidential manner. Confidential information should never be used casually in conversation or shared with any person other than a '**need to know basis**'.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard.
- The Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

## 10 Complaints

- **City of Rochester School** has a complaints procedures. As a school we encourage children and families to raise with us complaints, concerns or comments and have a robust internal investigation process.
- The complaint policy states clearly the stages of complaints and where to escalate concerns following completion of process through [Ofsted](#).
- Safeguarding concerns should be raised with school immediately. If a concern or a child is at immediate risk then the individual needs to contact First Response 01634 334466 or the police on 101. All visitors are given a safeguarding leaflet that outlines how to share concerns and also code of conduct expected by visitors/contractors.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Whistleblowing Policy**.

## 11 Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of [“Keeping Children Safe in Education” \(2020\)](#) which covers Safeguarding information for all staff. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex A within [Keeping Children Safe in Education 2020](#). **Members of staff have signed to confirm that they have read and understood Part One.**
- The DSL will ensure that all new staff and volunteers (including temporary/supply staff) are aware of the school’s internal safeguarding processes.
- All staff members (including temporary/supply staff) will be made aware of the school’s expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy.
- All staff should undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners.
- All members of staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- The Trustees should recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- The DSL and Head Teacher will provide an annual report to the Trustees detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.

- **City of Rochester School** has a nominated lead for the Trustees, Claire Cooper, all the Trustees will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

## 12 Safe Working Practice

- All members of staff are required to work within clear guidelines on the school's Code of Conduct.
- Staff should be aware of the school's **Positive Behaviour Support Policy**, and any physical interventions must be in line with agreed policy and procedures.
- A list of staff that have accessed Team Teach training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in-line with guidance.
- If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with, for how long. Doors, ideally, should have a clear glass panel in them and be left open.
- Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [Guidance for safer working practice for those working with children and young people in education settings May 2019](#) (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the school's **Online Safety Policy and Acceptable Use Policy**.

## 13 Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
  - All staff will be supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## 14 Safer Recruitment

- **City of Rochester School** values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- **City of Rochester School** will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the school in making a decision about the suitability of the prospective employee.
- The Trustees will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. At all times the Headteacher and Trustees will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE (2020).
- Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#))
- We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

## 15 Allegations Against Members of Staff and Volunteers

- **City of Rochester School** recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.
- **City of Rochester School** understands the duty to refer to the LADO where it is alleged that anyone working 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;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:

- Allegations should be referred immediately to the Head Teacher or deputy in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway [LADO Leaflet](#) if you need further information.
  - In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance.
  - Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors should contact **the LADO directly on 01634 331065**.
  - The Headteacher or Chair of Governors will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Trustees will undertake further investigations before receiving advice from the LADO.
- **City of Rochester School** has a legal duty to refer to the [Disclosure and Barring](#) Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

### **15.1 Whistleblowing Procedure**

- All members of staff are made aware of the school's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
  - General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#).
  - Staff can also access the [NSPCC whistleblowing helpline](#) if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Further Guidance – if in doubt consult**

## 16 Safeguarding Children with Special Educational Needs and Disabilities

- **City of Rochester School** understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These children may have an impaired capacity to resist or avoid abuse.
- Autism is recognised as a disability, and some disabled children and adults may be more vulnerable to abuse than non-disabled people. This may be because some autistic people can experience differences with communication, social interaction, or have difficulty understanding other people's motives. Some may also be less able to recognise or report abuse. This requires professionals to be more vigilant with regard to recognising, reporting and investigating potential signs of abuse as well as ensuring that safeguarding issues remain on the agenda when working with children and young people on the autism spectrum.
- All staff will ensure that children with SEN and disabilities will be able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties will be supported to make sure that their voice is listened to and acted upon.
- It is important that all staff are aware that children with SEN and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying without outwardly showing signs.
- All members of staff are encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not make an assumption that they are related to the child's disability.

## 17 Online Safety

- It is recognised by **City of Rochester School** that the use of technology presents challenges and risks to children and adults both inside and outside of school. Some autistic young people may need extra support and guidance to stay safe online. Autistic people may be very honest and open and can automatically assume that other people they connect with online behave likewise. Sometimes this isn't the case, and the internet can pose several risk areas that are particularly relevant to people on the autism spectrum.
- The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.
- The DSL has overall responsibility for online safeguarding within the school.
- The DSL and leadership team have read annex C regarding Online Safety within 'Keeping Children Safe in Education' 2020.
- **City of Rochester School** identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into three areas of risk:
  - **Content:** being exposed to illegal, inappropriate or harmful material
  - **Contact:** being subjected to harmful online interaction with other users

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **City of Rochester School**, recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2020 and has appropriate policies in place that are shared and understood by all members of the school community. Further information reading the specific approaches relating to this can be found in the school's **Online Safety Policy** and **Acceptable Use Policy**.
- Should concerns around indecent images arise the police may, need to be involved in cases to ensure thorough investigation including collection of all evidence. Adults should not view youth produced sexual imagery. Never copy, print or share the imagery; this is illegal.
- All incidents relating to youth produced sexual imagery need to be recorded in school or college. This includes incidents that have been referred to external agencies and those that have not.
- All members of staff have access to appropriate, regular and up-to-date online safety information as part of their safeguarding training.
- **City of Rochester School** will ensure that when pupils and staff access the school systems and internet provision appropriate filters and monitoring systems are in place.
- Filtering and monitoring are an important part of school's online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
- City of Rochester School recognises that many pupils and parents will have unlimited and unrestricted access to the internet via 3G and 4G in particular this is external to the school's control such as mobile phones and other internet enabled devices. Where concerns are identified appropriate action will be taken.
- **City of Rochester School** will ensure a comprehensive whole school curriculum is developed and in place to enable and equip all pupils with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively. Please see the 'Teaching online safety in school June 2019' guidance which outline how schools can ensure their pupils understand how to stay safe online.
- The school will also support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

## 18 Curriculum and Staying Safe

- [Working Together to Safeguard Children \(2018\)](#) states that the curriculum should ensure opportunities for "developing children's understanding, awareness and resilience".
- Schools play a pivotal and essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.



- The school uses the PSHE and RSE curriculum to increase self-esteem, self-awareness and social and emotional understanding, assertiveness and decision making this ensures that our pupils have a range of strategies to ensure their own protection and that they are able to also protect others. Online safety is also integrated into the curriculum.
- The school ensures that teachers that teach the PSHE curriculum have been trained and equipped to deliver high quality PSHE education in a safe way.
- Children feel they are able to talk to a range of staff when they feel they are worried and can feedback about their school experience. Children at **City of Rochester School** will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

Other systems that exist outside of expected day to day classroom interaction and support include: Posters on staying safe for children around the school, I need to talk Box, Child friendly safeguarding policy on school website and in pupil journals.

## 19 The Use of School Premises by Other Organisations

- Services or activities provided separately by another organisation from time to time may seek to use the school premises. The Headteacher or Trustees will seek written assurance that the organisations concerned have suitable policies and procedures in place with regard to safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers. Without this assurance then an application to use the premises will be refused

## 20 Security

- **City of Rochester School** has a responsibility to provide a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore all staff and people on the site have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass. School has a clear system of ensuring visitors are to be accompanied/supervised by regulated staff member. Any individual on site who is not known or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.
- **City of Rochester School** will not tolerate or accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe). This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## 21 Monitoring and Review

- All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/guardians.

- This policy has been written in (September 2020) to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare.
- All staff should have access to this policy and sign to the effect that they have read and understood its contents. The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.
- The policy forms part of our school development plan and will be reviewed annually.

## 22 Local Support - Medway

- All members of Staff in **City of Rochester School** are made aware of local support available.

If a child may be at risk of **imminent harm** you should call **Children's Services First Response Team on 01634 334466** and/or the **Police on 999**

- **Contact details for Education Safeguarding Officers (Education Safeguarding Service)**

- Kate Barry (Education Safeguarding Officer – Full time)  
01634 331017  
[kate.barry@medway.gov.uk](mailto:kate.barry@medway.gov.uk)  
[educsafeguarding@medway.gov.uk](mailto:educsafeguarding@medway.gov.uk)
- Maisie Adkins (Interim Operational LADO and Education Safeguarding Manager)  
01634 331065  
[maisie.adkins@medway.gov.uk](mailto:maisie.adkins@medway.gov.uk)  
[educsafeguarding@medway.gov.uk](mailto:educsafeguarding@medway.gov.uk)

- **Education Lead in MASH:**

- Ben Beer (Education Lead – MASH)  
01634 334525  
[Benjamin.beer@medway.gov.uk](mailto:Benjamin.beer@medway.gov.uk)

- **Contact details for the LADO:**

- Telephone: 01634 331065
- Further information and contact details found: [Advice and resources for professionals](#)

- **Children's Social Work Services**

- First Response: 01634 334466 (Monday to Friday from 9am to 5pm)
- Out of Hours: 03000 419 191

- **Kent Police**

- 101 (or 999 if there is an immediate risk of harm)

- **Medway Safeguarding Children Partnership (MSCP)**

- [mscp@medway.gov.uk](mailto:mscp@medway.gov.uk)
- 01634 336 329

## Local Support - Kent

- **Contact details for Area Safeguarding Advisor (Education Safeguarding Service)**
  - [www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts](http://www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts)
  - North Kent 03000 41 24 45
- **Contact details for Online Safety in the Education Safeguarding Service**
  - **03000 415797**
  - [esafetyofficer@theeducationpeople.org](mailto:esafetyofficer@theeducationpeople.org) (non-urgent issues only)
- **Contact details for the LADO**
  - **Telephone: 03000 410888**
  - Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
- **Integrated Children's Services**
  - Front door: 03000 411111
  - Out of Hours Number: 03000 419191
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
  - 03000 421126

## 23 National Support

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Pupils

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)

- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

# APPENDIX 1

## Definitions of Forms of Abuse/Specific Safeguarding Issues

### Definitions of Forms of Abuse

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

- **Abuse:** 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Please click on the hyper link for further information, advice and guidance: [NSPCC Physical Abuse](#)

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Please click on the hyper link for further information, advice and guidance: [NSPCC Emotional Abuse](#)

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Please click on the hyper link for further information, advice and guidance: [NSPCC Sexual Abuse](#)

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use

of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Please click on the hyper link for further information, advice and guidance: [NSPCC Neglect](#)

## Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex A: Keeping Children Safe in Education 2020

### Mental Health

- The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#).

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

- Mind <https://www.mind.org.uk/>
- Young Minds <https://youngminds.org.uk/>
- Papyrus - <https://papyrus-uk.org/> Prevention of Suicide
- NSPCC <https://learning.nspcc.org.uk/child-health-development/child-mental-health>
- Every mind matters <https://www.nhs.uk/oneyou/>

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the [Link Programme](#). Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Domestic Abuse

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)

### Honour based Violence (FGM and Breast Ironing)

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- Information and resources <https://www.gov.uk/government/collections/female-genital-mutilation>
- Multi agency guidance <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>
- National FGM Centre <http://nationalfgmcentre.org.uk/fgm/>

## Sexual Abuse and CSE

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

## Drugs

- Drugs advice for Schools: [Gov.uk Drugs advice for schools](http://Gov.uk%20Drugs%20advice%20for%20schools)
- Talk to Frank <https://www.talktofrank.com/>

## Online Safety

- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

## Radicalisation and hate

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## APPENDIX 2

### Related Safeguarding Policies

This policy is one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies as listed below: (to be read and followed alongside this document).

- Positive Behaviour Support
- Online Safety
- Anti-Bullying
- Staff Behaviour
- Acceptable Use of ICT
- Personal Electronic Devices
- Data Protection
- Relationships and Sex Education
- Health, Safety and Welfare
- Attendance
- Risk Assessments (e.g. school trips, use of technology)
- First Aid and Administration of Medication
- Safer Recruitment
- Whistleblowing



## APPENDIX 3

### Procedure for dealing with disclosures (the 6 R's – what to do if)

#### 1. Receive:

- Listen to what is being said without displaying shock or disbelief you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

#### 2. Reassure:

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now".
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

#### 3. React:

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

#### 4. Record:

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used by the child
- Record statements and observable things, not your interpretations or assumptions – keep it factual.

#### 5. Remember:

- Contact the designated member of staff
- The designated teacher may be required to make appropriate records available to other agencies

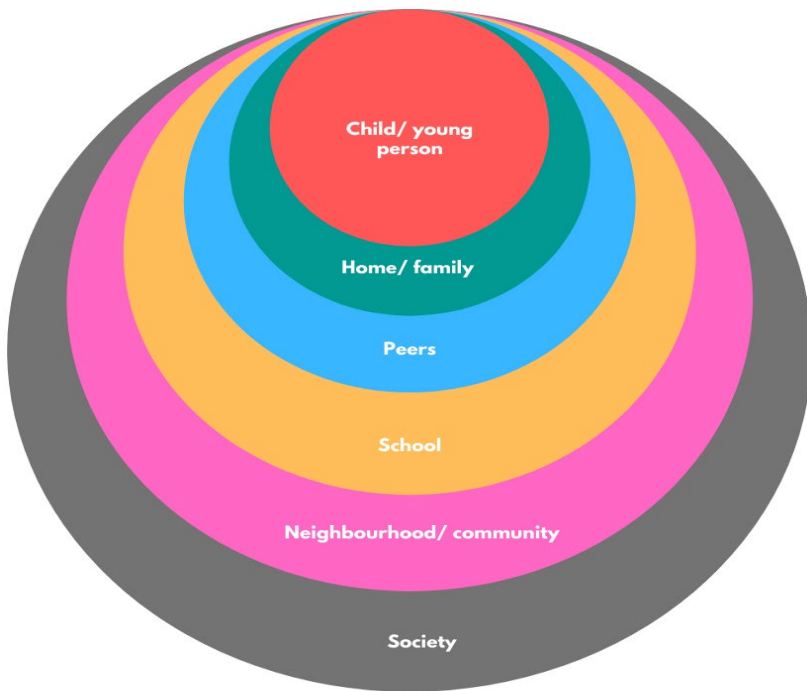
#### 6. Relax

- Get some support for yourself

## APPENDIX 4

### Extra Familial Harm - Contextual safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighborhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding can be simply illustrated as:



#### Contextual Safeguarding – Areas of Risk

Contextual Safeguarding is applicable to a wide range of risks which can potentially cause significant harm to children and young people where the prime cause of harm is outside of the family. This list isn't exhaustive but includes:

- peer on peer and relationship abuse
- criminal/ sexual exploitation/ online abuse
- missing episodes
- risks associated with gangs
- risks associated with radicalisation
- safeguarding risks in public spaces
- trafficking and modern slavery

#### Importance of Context:

As children move from early childhood and into adolescence they spend increasing amounts of time socialising independently of their families. During this time the nature of young people's schools and neighbourhoods, and the relationships that they form in these settings, inform the extent to which they encounter protection or abuse. Evidence shows that, for example: from robbery on public transport, sexual violence in parks and gang-related violence on streets, through to online bullying and harassment from school-based peers and abuse within their intimate relationships, young people encounter significant harm in a range of settings beyond their families.

***'Safeguarding is everyone's responsibility' is often interpreted as making referrals and sharing information' We need to think about taking it further and not only think about the individuals but also the context in which the harm occurs. Always consider the environment as well as the individual.***

***What is the context?***

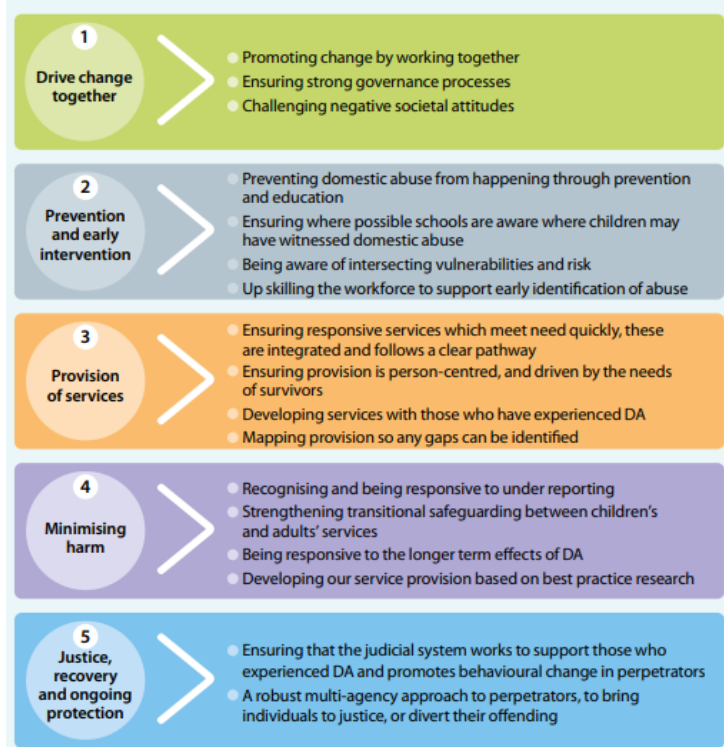
**[TED Talk Contextual Safeguarding: Re-writing the rules of child protection](#)**

Local Context

## Medway Community Safety Partnership Priorities 2020 onwards (County Lines, Exploitation and Serious Violence)

- Kent Fire and Rescue Service to support Pupil Referral units where requested and work with disaffected children at school delivering youth work around road, water and fire safety.
- Medway Task Force - To develop a Safety in Action initiative with all partners for Medway Year 6 pupils to develop resilience for young people moving into secondary education
- Medway Task Force - To work with key schools to support them in preventing their pupils from becoming victims and perpetrators of violent crime or drug involvement
- Medway Task Force - To work with identified young people at risk of offending to deter them from criminality
- Medway Council – Develop a targeted youth work programme to tackle community hot spots.
- Medway Council – Develop a targeted youth work programme to tackle community hot spots.
- Medway Task Force - To work closely with partners to identify and target harden those places and spaces where adults and young people are at greater risk of exploitation.
- Medway Task Force - To work with partners to respond to individuals and families who have multiple vulnerabilities to provide the necessary support to prevent them from becoming victims or perpetrators of crime.
- Kent Fire and Rescue Service - fire setter visits to children and young people that have started fires or have shown in interest in starting fires and complete safer driver interventions for older drivers and passengers.
- Medway Council – Creation of a new team within Children’s Services to support children in need of help.
- Medway Council – Improved focus on steps downs from YOT to Early Help.
- Medway Council – Services to be support in using risk tools to identify needs and vulnerability and impact (prevent, CSE, Missing).
- Medway Council – Increased awareness of the risk of radicalisation.
- Public Health - PHSE materials and training for schools.

### Kent and Medway Domestic Abuse Strategy 2020 – 2023



### APPENDIX 5

## ***When to call the police?***



The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- [When to call the police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

This advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Contact with police should ideally be made by a single point of contact from the school. This may be the Headteacher or the designated safeguarding lead to ensure all the relevant information is shared and improve consistency of referrals.

When an incident occurs in which a crime has or may have been committed, the school or college need to consider whether to involve the police. Many incidents can be dealt with and resolved internally. The school or college behaviour policy will give guidance on how to deal with and record such incidents. In making a decision to involve the police it is important that the school or college ensure a balance is struck between the needs of the students involved and the needs of other students and the wider school or college community.

The victim in any incident should be supported and protected as a priority. Those suspected of being the offender will also need to be supported. There will often be significant circumstances in a young person's life that are contributing factors to an incident and it is important that they are taken into consideration. The seriousness of the incident will be a judgement call for the school or college. In making this decision the level of harm and the circumstances leading to the incident would need to be carefully considered.

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the school or college should cease their own investigation, having asked only enough questions to establish the basic facts of the incident. Every effort should be made by the school or college to preserve any relevant evidence.

## **APPENDIX 6**

### **Managing Allegations Against Staff**

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

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

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

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

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

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

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

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

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

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

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

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

### **Timescales**

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

### **Specific actions**

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

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

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

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

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

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

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

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

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

### **Confidentiality**

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

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

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

### **Record-keeping**

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

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

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

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



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

## **References**

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

## **Learning lessons**

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

This will include consideration of (as applicable):

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