

# NEWMAN CATHOLIC COLLEGE



## SAFEGUARDING & CHILD PROTECTION POLICY 2023-2024

**COMMITTEE WITH RESPONSIBILITY FOR  
MONITORING AND REVIEW:**

[Personnel Committee](#)

**Submitted to Governing Body September 2023  
Due for renewal September 2024**

## **CONTENTS:**

- 1. INTRODUCTION -**
- 2. DEFINITIONS -**
- 3. PREVENTION & THE ETHOS OF THE SCHOOL -**
- 4. PROCEDURES AND CONTACTS -**
- 5. SINGLE CENTRAL REGISTER -**
- 6. WHISTLEBLOWING -**
- 7. SAFEGUARDING THE SITE OF THE SCHOOL -**
- 8. RESPONSIBILITIES AND RECORD KEEPING -**
- 9. SUPPORTING VULNERABLE STUDENTS -**
- 10. SAFEGUARDING CATEGORIES -**
- 11. INAPPROPRIATE PHYSICAL/SEXUAL BEHAVIOUR INVOLVING STUDENTS**
- 12. SUPPORTING STAFF -**
- 13. ALLEGATIONS AGAINST STAFF -**
- 14. REASONABLE RESTRAINT/POSITIVE HANDLING -**
- 15. ANTI BULLYING -**
- 16. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY -**
- 17. RACIST INCIDENTS -**
- 18. HEALTH AND SAFETY-**
- 19. KEEPING AND ADMINISTERING MEDICINE -**
- 20. PREVENTING GROOMING AND RADICALISATION -**
- 21. DEVELOPING BRITISH VALUES -**
- 22. POLICY REVIEW AND STAFF TRAINING AND AWARENESS -**
- 23. ASSOCIATED POLICIES -**
- 24. APPENDICES -**
  - **APPENDIX A – Types of Abuse**
  - **APPENDIX B – Sample Staff ID**
  - **APPENDIX C – Staff Safeguarding Training Schedule**
  - **APPENDIX D – Summary Safeguarding and Child Protection Policy Poster**
  - **APPENDIX E – School Safeguarding Team Poster**
  - **APPENDIX F - Specific Safeguarding Issues**
  - **APPENDIX G – Safer Recruitment**

## ○ APPENDIX H – Harm Thresholds

### 1) INTRODUCTION

- 1.1 Newman Catholic College (NCC) fully recognises the responsibility it has under section 175 of the Education Act 2002<sup>1</sup> to have arrangements in place to safeguard and promote the welfare of children. The Headteacher should ensure that this policy is understood, and followed by all staff.
- 1.2 This policy sets out how the school's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the school. Governing bodies and proprietors should ensure they facilitate a whole school or college approach to safeguarding. Through their day-to-day contact with students and direct work with families, staff at the school have a crucial role to play in developing a culture of vigilance, for instance through noticing indicators of possible abuse or neglect and referring them to Social Care via Brent the Brent Family Front Door, the Brent LADO or the school's DSL (See section 4).
- 1.3 This policy sets out how the school's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the school. Our policy applies to all staff, paid and unpaid, working in the school including governors. Teaching assistants, mid-day supervisors, secretaries as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the school and its governors.
- 1.4 This policy has been developed in accordance with the principles established by:
- i. The Children's Act 1989
  - ii. The Children's Act 2004
  - iii. Education Act 2002 (section 175)
  - iv. Keeping Children Safe in Education (DFE September 2023)
  - v. Working Together to Safeguard Children (DfE July 2018)
  - vi. The Education (Student Information) (England) Regulations 2005
  - vii. Education Act (1996)
  - viii. Children Act (1989)
  - ix. Sexual Offences Act (2003)
  - x. Information Sharing (2015)

### 2) DEFINITIONS:

- 2.1 Safeguarding is defined as: Safeguarding as defined in the Joint Inspector's Safeguarding Report is taken to mean "All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare are minimised" and "where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agree local policies and procedures in full partnership with other agencies"

---

<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2002/32/section/175>

- 2.2 Child Protection is defined as “the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect”. It involves measures and structures designed to prevent and respond to abuse and neglect.
- 2.3 A vulnerable student is defined as a young person who the school has identified as being at risk of or the subject of either safeguarding or child protection concerns or a child with identified SEND. This includes children who are looked after (CLA), subject of child protection (CP) or child in need (CIN) plans, who have a recognised health condition, who have social service intervention at any other level, children who are missing from education, and children whose parent/carer has expressed an intention to educate them at home or where an in-school concern has been raised. Such students are identified on the NCC ‘Vulnerable Student Register’ through the Social Inclusion Forum, which is reviewed termly.

### **3) PREVENTION & THE ETHOS OF THE SCHOOL**

- 3.1 NCC is a Catholic School. Our principle that ‘Everybody Contributes, Everybody Counts, Everybody Succeeds’ is the very core of Safeguarding and the pastoral care of our students. The care guidance and support offered to students at NCC is based upon the teachings of Jesus through the Gospel values and the Beatitudes to ensure that all students are treated in an equal and appropriately confidential and caring way.
- 3.2 We recognise that the school plays a significant part in the prevention of harm to our children by providing children with effective lines of communication with trusted adults, supportive friends and an ethos of protection.
- 3.3 The school community will therefore:
- 3.3.1 Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
  - 3.3.2 Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
  - 3.3.3 Provide across the curriculum, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
  - 3.3.4 Ensure that all pupils are treated equally: We recognise that some children have an increased risk of abuse. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:
    - Have special educational needs (SEN) or disabilities (see 2.3 & 11.1.4)
    - Have a recognised health condition
    - Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see 2.3 & 10.9)

#### 4) PROCEDURES and CONTACTS

4.1 The following contacts should be used when following procedures and making a referral:

- i. **NCC Safeguarding email address:** [safeguarding@ncc.brent.sch.uk](mailto:safeguarding@ncc.brent.sch.uk) (Tel 0208 965 3947)
- ii. **The Designated Safeguarding Lead (DSL) is:** Miss Sakina Jackson (Assistant Headteacher).
- iii. **The Deputy Designated Safeguarding Leads ( DSLs) are:** Miss Belinda Goodin ( Lead Learning Mentor and Multi Agency Coordinator) , Mrs Mary Murphy (Deputy Headteacher) and Mr Dennis Nwandison (Assistant Headteacher)
- iv. **Other safeguarding officers are:** Joanne Englishby; Mr Curtis Albert; Mr John Roche and Ms Anjali Saran
- v. **The Governor nominated for Safeguarding and Child Protection is:** Mr Todor Ostojic
- vi. **The Local Authority Designated Officer (LADO) for addressing allegations against staff and volunteers is** Cecelia Gabriel – 0208 937 2090 · [brent.lado@gcsx.gov.uk](mailto:brent.lado@gcsx.gov.uk).  
Brent Children and Family Services: [family.frontdoor@brent.gov.uk](mailto:family.frontdoor@brent.gov.uk) or 020 8937 4300 (option 1).
- vii. **Head of Safeguarding & Quality Assurance is:** Sonya Kalyniak:  
[sonya.kalyniak@brent.sch.uk](mailto:sonya.kalyniak@brent.sch.uk)
- viii. **Brent LCSB:** <http://www.brentlscb.org.uk/> - **Brent Family Front Door:** 020 8937 4300 – **Brent FFD MASH Consultation Line for professionals** – 0208 937 2228 (Mon-Fri – 9am-12.30; 1.30pm-5pm)

**4.2** The designated safeguarding lead (DSL) and any deputies are most likely to have the complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns

**4.3** Staff are required to read and sign to say they have understood the content of the following documentation on an annual basis:

- The NCC Safeguarding and Child Protection Policy
- Keeping Children Safe in Education (Part one and school leaders and staff working directly with children should also read Annex A)
- Preventing Radicalisation and Extremism policy
- Behaviour for Progress Policy
- Staff Code of Conduct
- Attendance and Punctuality Policy (inc Children Missing in Education)

**4.4** [What to do if you are worried a child is being abused](#): If you are concerned that abuse is taking place, please record any detailed information on the yellow concern form and hand it to the safeguarding officer for discussion and action. The four types of abuse are outlined in Appendix A.

**4.5 Reporting Procedure:**

All staff are required to report any safeguarding concern immediately using the following steps:

- a) Either as a witness or relating to a verbal disclosure, listen to a young person's disclosure. Ensure students are clear that any disclosure or information would need to be passed on to the appropriate staff members.
- b) Report verbally (as soon as possible, before the end of school) to a named safeguarding officer.
- c) Write a detailed report of their actions/words on the yellow paper form (Located in the staffroom).
- d) Hand the yellow report to a safeguarding officer as soon as possible before the end of the school day.
- e) Safeguarding officer should then decide upon the most appropriate course of action and record the new incident/concern on the Online reporting system (e.g. CPOMS).
- f) If the DSL is not available, and concerns should be passed onto the Deputy DSL or another safeguarding officer.

## **5) SINGLE CENTRAL REGISTER – PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN**

5.1 We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below. (Please also refer to **Appendix G: Safer Recruitment**)

### **5.2 New staff**

When appointing new staff, we will:

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

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

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

In accordance with the updated guidance ( KCSIE 2023), we may also undertake online searches on shortlisted candidates as part of our pre- recruitment checks.

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

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **5.4 Existing staff**

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

### **5.6 Contractors**

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

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

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

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

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

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

### **5.7 Trainee/student teachers**

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

### **5.8 Volunteers**

We will:



- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

## **5.9 Governors**

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

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

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

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

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

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

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

## **5.12 Pupils staying with host families**

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

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

## **6) PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING)**

- 6.1 This policy adheres to Diocese of Westminster guidance.<sup>2</sup>
- 6.2 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 6.3 All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should contact the DSL or the Chair of Governors.
- 6.4 Whistleblowing: Any allegation of abuse made against a member of staff will be reported straight away to the Head Teacher or Principal. In cases where the Head Teacher or Principal is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in p16 of Keeping Children Safe in Education<sup>3</sup>.

<sup>2</sup> [http://rcdow.org.uk/att/files/public%20interest%20disclosure%20\(whistleblowing\)%20policy%202014.pdf](http://rcdow.org.uk/att/files/public%20interest%20disclosure%20(whistleblowing)%20policy%202014.pdf)

<sup>3</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- 6.5 The school will consult with the LADO in the event of an allegation being made against a member of staff and adhere to the relevant procedures set out in Keeping Children Safe in Education.
- 6.6 The DSL will liaise with the LADO ensuring that all allegations are reported to the LADO within one working day. Following consultation with the LADO, the Named Senior Officer will advise on all further action to be taken. Please note that the Head Teacher or Chair of Governors should **not** seek to interview the child/ren or members of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary.
- 6.7 The school will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- 6.8 Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
- 6.9 Consideration must be given to the needs of the child and a recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.
- 6.10 The school will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents/carers as advised within the Local Authority's Code of Conduct. As part of the Induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.
- 6.11 All staff have signed to confirm that they have read a copy of this policy (Safeguarding and Child Protection Policy 2022-2023) and subsequent policies at the beginning of each academic year.

## **7) SAFEGUARDING THE SITE OF THE SCHOOL (INCLUDING AFTER HOURS):**

### **7.1 Extended Schools and before and After School Activities (on or off school site)**

- 7.1.1 If the governing body provides extended school facilities or before or after school activities directly under the supervision or management of school staff, the school's arrangements for child protection as written in this policy shall apply.
- 7.1.2 Where services or activities are provided separately by another body, either on or off school site, the governing body will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate.

## **7.2 Visitors and Adults on the school site during the school day:**

- 7.2.1 All staff are expected to wear their NCC Identification badge and green lanyard at all times whilst on site. All visitors must report to the main reception, to sign in. Their credentials and identification will be requested on arrival, before an NCC visitor badge can be offered. Visitors with DBS clearance will be offered a green NCC visitor badge. Visitors without DBS clearance will be offered a red NCC visitor badge.

## **7.3 Visitors and Adults on the school site outside of school hours:**

- 7.3.1 Where extended school provision is offered directly under the supervision or management of school staff, the school's safeguarding arrangements will apply. Where provision is provided by an external organisation, the governing body of the school is responsible for confirming that the external organisation has appropriate safeguarding policies in place.
- 7.3.2 Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any other services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. **(Chapter 2 - Working Together 2018)**

## **8) RESPONSIBILITIES & RECORD KEEPING**

### **8.1 The school will:**

- 8.1.1. Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately
- 8.1.2. Ensure all records are kept securely; separate from the main student file, and in a locked location
- 8.1.3 Ensure all relevant child protection records are sent to the receiving school or establishment when a student moves schools in accordance with the Education Child Protection Record Keeping Guidance.<sup>4</sup>
- 8.1.4 E-copies of Yellow safeguarding concern reports will be retained (scanned) and entered into the CPOMS system, where safeguarding staff will log and retain files on the system and where they are retained. This is a confidential and secure electronic system with access limited to SLT and Safeguarding officers only. Any information shared with local authorities is in line with local safeguarding procedures.

---

4

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/339090/Record\\_Keeping\\_Guidance\\_for\\_Child\\_Protection\\_-\\_Aug\\_2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339090/Record_Keeping_Guidance_for_Child_Protection_-_Aug_2011.pdf)

- 8.1.5 Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

## **8.2 Role of the designated safeguarding lead (See annexe B of KSIE 2023):**

8.2 The broad areas of responsibility for the designated safeguarding lead are:

### **8.2.1 Managing referrals:**

- i. Refer all cases of suspected abuse to the local authority children's social care and:
- ii. Police (cases where a crime may have been committed).
- iii. Liaise with the head teacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- iv. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies Training
- v. The designated safeguarding lead at NCC should receive appropriate Level 3 training carried out every two years in order to:
- vi. Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- vii. Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- viii. Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff
- ix. Be alert to the specific needs of children in need, those with special educational needs and young carers
- x. Be able to keep detailed, accurate, secure written records of concerns and referrals
- xi. Obtain access to resources and attend any relevant or refresher training courses
- xii. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them Raising Awareness
- xiii. The designated safeguarding lead should ensure the school's policies are known and used appropriately:
- xiv. Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- xv. Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- xvi. Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- xvii. Where children leave the school will ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file

## **8.3 Role of the Governing Body**

- 8.3.1 Governing bodies and proprietors must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times.
- 8.3.2 The nominated governor for child protection is: Mr Todor Ostojic
- 8.3.3 In particular the Governing Body must ensure fulfilment of all responsibilities placed on governing bodies and proprietors including:
- i. their contribution to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified
  - ii. ensuring that an effective child protection policy is in place, together with a staff behaviour policy
  - iii. appointing a designated safeguarding lead who should undergo child protection training every two years
  - iv. prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns
  - v. Ensuring that children are taught about how to keep themselves safe and how to recognise and how to get help when they need it.

## 8.4 Confidentiality and information sharing

- 8.4.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Child protection information will be stored and handled in line with the principles of the “Information Sharing Advice for Safeguarding Practitioners” guidance (2015<sup>5</sup>). All staff in every service, from frontline practitioners to managers in statutory services and the voluntary sector should understand the circumstances in which they may lawfully share information, and that it is in the public interest to prioritise the safety and welfare of children. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child. The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Staff should not disclose information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- 8.4.2 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parents to see child protection requests, they will refer the request to the Designated Person or Headteacher.
- 8.4.3 The school will:
- i. Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager or Social Care as required.\* **Information sharing: Guidance for practitioners and managers** is available from Department of Education. [www.education.gov.uk](http://www.education.gov.uk)

---

<sup>5</sup> <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

- ii. ensure that the Headteacher or Designated Person will only disclose any information about a student to other members of staff on a 'need to know' basis, including Domestic Violence notifications
- iii. make all staff aware that they have a professional responsibility to share information with other agencies in order to safeguard children
- iv. ensure staff are clear with children that they cannot promise to keep secrets from students and that safeguarding disclosures must be passed on to relevant contacts (see section 4).

## **8.5 PRIVATE FOSTERING**

If it is discovered by a member of staff that a student is subject to a private fostering arrangement, it is the school's mandatory duty to inform the local authority. Any staff member suspecting such an arrangement whereby a child is living with family members or family friends must report it to the DSL (or Deputy DSLs).

## **9) SUPPORTING VULNERABLE CHILDREN**

- 9.1 We recognise that abuse or witnessing violence may have an adverse impact on those children who may last into adulthood without appropriate intervention and support.
- 9.2 This school may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at school their behaviour may be challenging and defiant or they may become withdrawn.
- 9.3 We recognise that some vulnerable children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

### **9.4 The school will support the student through:**

- 9.4.1 Curricular opportunities to encourage self-esteem and self-motivation
- 9.4.2 An ethos that actively promotes a positive, supportive and safe environment and values the whole community
- 9.4.3 The school's behaviour policy will support vulnerable students in the school. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the student's sense of self worth. The school will ensure that the student knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred
- 9.4.4 Liaison with other agencies which support the student such as Social Care, Child and Adolescent Mental Health Services, Brent Sexual Behaviour Service or Locality Teams, Brent Social Relationships Education department
- 9.4.5 A commitment to develop productive and supportive relationships with parents/carers

- 9.4.6 Recognition that children living in a home environment where there is domestic abuse, drug or alcohol abuse or mental health issues are vulnerable and in need of support and protection; they may also be young carers
- 9.4.7 Monitoring and supporting student's welfare, keeping records and notifying Social Care in accordance with the Brent Local Safeguarding Children Board "Core Inter - Agency Procedures"
- 9.4.8 When a student who is subject to a child protection plan leaves, information will be transferred to the new school immediately. The Child Protection Review Manager and Lead Social Worker from Social Care will also be informed
- 9.4.9 When a child is missing from education, the school will follow the procedure as set out in BRENT's Children Missing Education guidance and inform the Education Welfare Officer and Social Care if a child is subject to a Child Protection Plan or there have been ongoing concerns.

## **9.5 Substance Misuse and Child Protection (Please refer to NCC Drugs Policy)**

- 9.5.1 The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:
- 9.5.2 When there is evidence or reasonable cause:
  - i. to believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse
  - ii. to believe the student's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults
  - iii. Where the misuse is suspected of being linked to parent/carer substance misuse.

## **9.6 Children of Substance Misusing Parents/Carers**

- 9.6.1 Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.
- 9.6.2 When the school receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.
- 9.6.3 This is particularly important if the following factors are present:
  - i. Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
  - ii. Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers
  - iii. The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
  - iv. Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
  - v. Disturbed moods as a result of withdrawal symptoms or dependency

- vi. Unsafe storage of drugs and/or alcohol or injecting equipment
- vii. Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child

## **9.7 Domestic Abuse**

- 9.7.1 Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships.
- 9.7.2 Head Teachers are notified of Domestic Abuse incidents where the police have been called and that involve children and young people on their roll and will take appropriate action to ensure children and young people are kept safe in accordance with the Domestic Violence Guidance for Schools.

## **9.8 Students with Special Educational Needs**

- 9.8.1 We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
  - Pupils being more prone to peer group isolation than other pupils
  - The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
  - Communication barriers and difficulties in overcoming these barriers
- 9.8.2 We offer extra pastoral support for pupils with SEN and disabilities. This includes:
  - A wide ranging mental health menu
  - In-class Sport and Thought "Behaviour Coaching" support (In addition to LSA support)
  - After school SEND homework club

## **9.9 – Children who need a social worker (Child Protection Plans and Child in Need)**

- 9.9.1 Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. DSL and safeguarding team should assist social workers so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- 9.9.2 Where possible, information on children on CP and CIN plans and the outcomes of their support being received from social workers should be shared at the social inclusion forum.
- 9.9.3 Children with CP/CIN plans should benefit from extra safeguarding consideration (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **10) SAFEGUARDING CATEGORIES:**

- 10.1 In September 2012, The Home Office announced that the definition of domestic violence be implemented in March 2013 and states: "Any incident or pattern of incidents of controlling,



coercive or threatening behaviour, violence or abuse between intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse: Psychological, Physical, Sexual, Financial and Emotional” (**Brent.gov.uk**).

- 10.2 “Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- 10.3 “Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim”. This definition of controlling behaviour, which is not a legal definition, includes so called '**honour**' based violence, **female genital mutilation (FGM)** and **forced marriage**, and is clear that victims are not confined to one gender or ethnic group.

#### **10.4 Female genital mutilation (FGM)**

- 10.4.1 Female genital mutilation includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. It is a surprisingly common form of abuse in the UK.
- 10.4.2 FGM is carried out on children between the ages of 0–15, depending on the community in which they live. It is extremely harmful and has short and long term effects on physical and psychological health.
- 10.4.3 FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK.
- 10.4.4 The school takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy. Teachers who discover that female genital mutilation appears to have been carried out on a pupil under 18 should discuss the case with the DSL unless they've been specifically told not to disclose by a higher authority.
- 10.4.5 The Designated Person will make appropriate and timely referrals to Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. The case will still be referred to Social Care even if it is against the student's wishes. Guidance for reporting suspected FGM to the police is outlined in “Mandatory Reporting of FGM: Procedural Information”<sup>6</sup>
- 10.4.6 Some indications that **FGM may have taken place** include:
- i. The family comes from a community that is known to practice FGM, especially if there are elderly women present in the extended family;

---

6

- ii. A girl / young woman may spend time out of the classroom or from other activities, with bladder or menstrual problems;
- iii. A long absence from school or in the school holidays could be an indication that a girl / young woman has recently undergone an FGM procedure, particularly if there are behavioural changes on her return (this may also be due to a forced marriage - (see Safeguarding Children and Young People from Forced Marriage Procedure);
- iv. A girl / young woman requiring being excused from physical exercise lessons without the support of her GP;
- v. A girl / young woman may ask for help, either directly or indirectly;
- vi. A girl / young woman who is suffering emotional / psychological effects of undergoing FGM, for example withdrawal or depression;
- vii. Midwives and obstetricians may become aware that FGM has taken place when treating a pregnant woman / young woman.

10.4.7 All students, including males, should be made aware of the risks and signs of FGM

10.4.8 All staff should raise any female genital mutilation (FGM)-related concerns with the DSL (or deputy DSL).

10.4.9 It is a mandatory duty on teachers to report disclosures on FGM about a female under 18 personally to the police.

**10.5 Honour Based Violence** is violence committed to protect or defend the ‘honour’ of a family and/or community. This can affect male and female students, however women, especially young women, are the most common targets, often where they have acted outside community boundaries of perceived acceptable feminine/sexual behaviour. In extreme cases the young person may be killed.

**10.6 Forced Marriage** - One or both people do not (or in cases of people with learning or physical disabilities, cannot) consent to the marriage and pressure or abuse is used. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they’re bringing shame on their family).

**10.6 Action to take if workers believe a child is at risk of FGM, honour based violence or Forced Marriage** - Any information or concern that a girl / young woman is at risk of, or has undergone FGM should result in an immediate referral to the **NCC Safeguarding Officer(s)**. A further referral to Brent social Care will be made: **020 8937 4300**. Further support documentation from Brent<sup>7</sup>

**10.7 Mental Health** – Mental health problems can be an indicator of (historical) abuse, neglect, exploitation or adverse childhood experiences (ACEs). Staff who observe students developing mental health problems should refer concerns to the safeguarding team and the SENDco whereby a professional assessment or diagnosis can be arranged. Staff should be aware of ACES, and through training, should be able to identify their signs, and maintain communication with pastoral and safeguarding leads where they have concerns regarding an individual.

---

<sup>7</sup> <http://democracy.brent.gov.uk/documents/s15947/tackling-violence-against-women.pdf>

**10.8** Bullying can also be linked to mental health concerns. Staff should refer to DfE guidance<sup>8</sup> and seek support from pastoral leads when tackling and preventing bullying.

### **10.9 Looked-After and Previously Looked-After Children**

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

**10.9.2** We have appointed a designated teacher, Ms Jo Englishby, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## **10.7 Sharing of nude and semi-nude images**

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

(For further guidance on sharing of nude and semi nude images, please refer to the [UKCIS Guidance: sexting in schools and colleges 2017](#)<sup>9</sup>)

If you are made aware of an incident involving sharing of nude and semi nude images (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately. You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

---

8

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)

9

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

### **10.7.2 Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

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

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

- They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.
- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

#### **10.7.4 Informing parents**

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

#### **10.7.5 Referring to the police**

- If it is necessary to refer an incident to the police, this will be done through the safer schools' officer

#### **10.7.6 Recording incidents**

- All sharing of nude and semi-nude images incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 8 of this policy also apply to recording incidents of sharing of nude and semi-nude images.

#### **10.7.7 Curriculum coverage**

- Pupils are taught about the issues surrounding sharing of nude and semi-nude images as part of our SRE education programme. Teaching covers the following in relation to sharing of nude and semi-nude images:
  - What it is
  - How it is most likely to be encountered
  - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
  - Issues of legality
  - The risk of damage to people's feelings and reputation
  - Pupils also learn the strategies and skills needed to manage:
    - Specific requests or pressure to provide (or forward) such images
    - The receipt of such images

This policy on sharing of nude and semi nude images is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### **11) CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

#### **11.1 Defining sexual violence and sexual harassment**

- 11.1.1 We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. Sexual violence and sexual harassment can occur between two children of any age and gender. It can also occur through a group of children sexually assaulting or sexually harassing a

single child or group of children. Evidence shows that girls are at a higher risk of sexual violence or harassment.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

11.1.2 At NCC, staff should make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. At NCC we do not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh”.

11.1.3 Examples of sexually violent or harassing behaviour: Challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

11.1.4 Students with SEND are three more times likely to be sexually abused or harassed. Any allegation involving a student with SEND should involve the input of the SENCO (or deputy SENCO). Staff should be aware of potential barriers that a student's SEND status:

- could impact on their ability to communicate an act of sexual harassment or abuse
- could disproportionately be impacted on by behaviours such as bullying and harassment without necessarily showing outward signs of this.
- could mean that behaviours relating to their SEND could potentially mask evidence of any abuse. This should not be overlooked.

11.1.4 Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT

11.1.6 For government definitions of Rape, Sexual Violence, Sexual Harassment, Harmful Sexual Behaviour can be referred to [on this document](#).

## **11.2 Whole School Approach**

11.2.1 Safeguarding is a whole-school matter that involves all staff (teaching and non-teaching) and students alike. Senior leaders, school council, families and local community groups all have an important role in supporting safeguarding in the school.

- 11.2.2 Contextual Safeguarding: The Social Inclusion Forum (SIF) should act as a hub for the safeguarding team to share contextual information. Those agencies present at the SIF or those agencies working with the school on certain cases should be encouraged to share as much information as possible to maximise the holistic understanding of any student or case to best safeguard them, their families and their wider social networks. Information sharing is vital to good safeguarding, and fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

### 11.3 Examples of sexual violence and sexual harassment

- 11.3.1 Sexual violence refers to sexual offences under the Sexual Offences Act (2003) as described below i.e. rape, assault by penetration, and sexual assault.

- 11.3.2 Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline and is in the context of child on child sexual harassment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- ‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. **It is now a criminal offence.**
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment - this may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence and may include:
  - Non-consensual sharing of sexual images and videos;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media; and
  - Sexual exploitation; coercion and threats

### 11.3 Responding to reports of sexual violence and sexual harassment:

- Decisions made in response to such incidents should be made in a prompt manner on a case-by-case basis:

#### 11.4.1 Immediate Response:

All victims should be reassured, taken seriously and kept safe in a supportive manner. Staff reports should be made in an appropriate manner. This should be written as a summary of a student’s verbal report written AFTER verbal disclosure, to ensure the member of staff offers any student their full attention. This report must be written up (as per section 4.4) in a neutral manner with no personal opinion included. Victims should be made aware of staff duty to not keep any details secret and that they should be passed onto the DSL (or any other safeguarding officer immediately). A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should

a victim ever be made to feel ashamed for making a report. Where possible, this report should be managed with more than one staff member present.

#### **11.4.2 Assessing the management of a report of sexual violence and/or sexual harassment:**

- Any decision made by the school should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
- The DSL (or deputy) would then decide on one of the following options of action:

*a) Manage the case internally*

b) You must record the allegation and tell the DSL, but do not investigate it.

For example in cases of sexual harassment that are a one-off, the school may decide to apply the Behaviour for Progress policy and deal with the case internally.

All concerns discussions and decisions should be recorded (written and electronic).

*c) Seek early help with a multi-agency approach*

Any referral for early help should be with the full support of the school. This may be internally provided support or through a referral to Brent children and family services. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

*d) Refer to children's social care*

Where a child has been harmed, is at risk of harm, or is in immediate danger a referral to Brent children and family services should be made.

Any follow-up should be in collaboration between the school (via a member of the safeguarding team) and an involved authorities.

Any internal actions should be implemented immediately, regardless of when any external assessment or intervention begins.

*e) Report the case to the police*

As per advice for a referral to social care; The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

*f) Risk Support Plan*

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

11.4.3 Further details on following up on any potential criminal conviction and bail conditions are included in sections 193 and 218 (KCSIE 2022)

11.4.4 If the report includes an online element, staff should refer to DfE advice on **Searching, Screening and Confiscation** and/or **UK Council for Child internet safety**.

#### **11.4.5 Risk and Needs assessment:**



- Any risk assessment should consider the victim, the alleged perpetrator and any other children (or staff, where appropriate).
- A risk assessment should be recorded on the school's online safeguarding network and should be regularly reviewed and updated until such time as the risks are negated.
- Any internal risk assessment should be shared with any appropriate authorities as part of any potential further investigation.

#### **11.4.6 Following up on a report of sexual violence and/or sexual harassment:**

The DSL (or deputy) should then advise on the school's response, based on:

- How the victim wishes to proceed
- The nature of the incident (e.g. has a crime been committed)
- Ages of the students involved
- Developmental stages of the children involved
- Any age, social or other differences between those involved
- If there is a history/pattern of abuse or if the victim perceives this to be a one-off
- Any potential ongoing risks to the victim, other students, staff or the public
- Any issue relating to the contextual safeguarding history of any student involved

### **11.5 Ongoing Victim/Perpetrator Support**

11.5.1 Immediate consideration should be given to how to best protect the victim and support the alleged perpetrator. E.g. Consideration should be made if the victim and alleged perpetrator share a classroom, and how to keep a reasonable distance in general spaces whilst any investigation is ongoing.

#### **11.5.2 Ongoing Response:**

- Support and responses should be applied in a case-by-case basis and could require long-term support being put in place.
- Victims may not disclose all information immediately, and should be offered suitable channels of support whereby any potential further disclosures or need for support can be made.
- The Social Inclusion Forum should agree on the most suitable follow-up support for any student potentially experiencing trauma.
- The victim should be protected from any form of bullying or harassment.
- If the student were to move to another educational institution, any safeguarding information should be passed on to the new school with full disclosure between respective DSLs.

#### **11.5.3 Safeguarding and how to support the alleged perpetrator**

- The alleged perpetrator should be safeguarded and supported in an appropriate manner. The age and developmental stage of the alleged perpetrator should be considered. Consider that the alleged perpetrator could potentially have unmet needs which should be addressed following the usual channels (i.e. through the social inclusion forum).
- Following any potential police conviction, the perpetrator may be subject to the school's sanctions as outlined in the behaviour for progress policy.

- If the student were to move to another educational institution, any safeguarding information should be passed on to the new school with full disclosure between respective DSLs.

## **11.6 Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

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

## **11.7 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse – i.e. the use of [bullying@ncc.brent.sch.uk](mailto:bullying@ncc.brent.sch.uk) and [safeguarding@ncc.brent.sch.uk](mailto:safeguarding@ncc.brent.sch.uk) for email referrals for concerns. Students can report concerns to any staff member who will be able to refer to a safeguarding officer.
- This information is included in the student planner for students to be aware of at all times. Out of hours organisations are also promoted.

- It is emphasised to students that their concerns will be taken seriously, and that they can safely express their views and give feedback without personal repercussions.

## **11.8 Child sexual exploitation**

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

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

### **11.7.4 Those students involved can:**

- Affect students of any age under 18 years old
- Affect any vulnerable person over 18 years old
- Can be exploitation, even if the activity seems consensual
- Be acting under the threat of violence or bribery
- Be influenced by an individual or a group
- Is typified by some kind of power imbalance – i.e. Age, Gender, Cognitive ability, Physical strength etc

## **11.8 Serious Violent Crime**

Indicators that may signal that children are at risk from, or are involved with, serious violent crime may include:

- Unexplained gifts or new possessions - these can indicate that children have been approached by or involved with individuals associated with criminal networks or gangs

- Increased absence from school
- Change in friendship or relationships with others or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them. Any information pertaining to potential risks should be shared with safeguarding officers, even if it is out of the school context, as this can aid the process of contextual safeguarding and mapping or assessing risk.

## **12) SUPPORTING STAFF**

- 12.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 12.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support. This could be provided for all staff by, for example, the Headteacher, by Occupational Health, and/or a teacher/trade union representative as appropriate.
- 12.3 All staff receive training on the boundaries of appropriate behaviour. The document “Guidance on Safe Working Practices for the Protection of Children and Staff in Education Settings” provides advice on this and the circumstances which should be avoided in order to limit complaints against staff of abuse of trust, and/or allegations of physical or sexual abuse. These matters form part of staff induction and are referred to in the staff handbook and can be found in the Staff Code of Conduct.
- 12.4 We recognise that designated staff should have access to support and appropriate workshops, courses or meetings as organised by the LA.

## **13) ALLEGATIONS AGAINST STAFF**

- 13.1 This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:
  - Behaved in a way that has harmed a child, or may have harmed a child, or
  - Possibly committed a criminal offence against or related to a child, or
  - Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
  - Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 13.2 All school staff (including a supply teacher or volunteer) should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

- 13.3 All staff should be aware of the school's behaviour/discipline policy and Staff Code of Conduct. This can be found in the staff handbook.
- 13.4 We understand that a child may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL, or the Headteacher if the DSL is not present. The DSL will fully inform the Headteacher immediately.
- 13.5 The DSL on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) who is also the Safeguarding in Education Team Manager.
- 13.6 If the allegation made to a member of staff concerns the Headteacher or the DSL, the person receiving the allegation will immediately inform the Chair of Governors who will consult with the LADO without notifying the Headteacher first.
- 13.7 The school will follow the LA procedures for managing allegations against staff<sup>10</sup>.
- 13.8 'Suspension of the accused until the case is resolved' - Suspension of the member of staff against whom an allegation has been made requires careful consideration.
- 13.9 Our lettings agreement for other users requires that the organiser will manage the suspension of adults where necessary from school premises (i.e. Contractors).
- 13.10 See Appendix H for detailed explanation on the harm threshold, which should be referred to when assessing allegations. Section 1 is about allegations that may meet the harm threshold. Section 2 is about concerns that do not meet the harms threshold, and is entirely new

#### 13.10 Procedure for dealing with allegations:

- 13.10.1 In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:
- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
  - Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

---

<sup>10</sup> <http://www.brentlscb.org.uk/main/article.php?tag=Allegations&name=role&sector=home>

- 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. Trade Union advice is available for members who should seek their local representative.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible the governing board 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.

### **13.10.2 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

### **13.10.3 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.

### **14) REASONABLE RESTRAINT/POSITIVE HANDLING**

- 14.1 Our policy on physical intervention/positive handling by staff is set out separately, as part of our Staff Code of Conduct. It complies with DfE Restrictive Physical Intervention<sup>11</sup> (May 2013). This guidance states that staff must only ever use physical intervention as a last resort, e.g. when a child is endangering him/herself or others and that, at all times it must be the minimal force necessary to prevent injury to another person.
- 14.2 Such events should be recorded and signed by a witness.
- 14.3 Staff who are likely to need to use physical intervention should be appropriately trained.
- 14.4 We understand that physical intervention of a nature which causes injury or distress to a child, may be considered under child protection or disciplinary procedures.

### **15) ANTI-BULLYING**

- 15.1 Our policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

### **16) ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY**

- 16.1 Our policy on e-safety is set out in a separate document, and addresses issues relating to school computer usage code of conduct, social media guidance, safeguarding against online grooming and cyber bullying guidance. We have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors. This policy aims to protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones'). As of September 2023, the school has introduced a "No Mobile Phone Policy" in response to pupil's safeguarding concerns regarding mobile phone usage during school hours.

---

1. <sup>11</sup> [https://www.gov.uk/.../Restrictive-Physical-Intervention\\_Final-U.pdf](https://www.gov.uk/.../Restrictive-Physical-Intervention_Final-U.pdf)



- 16.2 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. All staff receive training on expectations, applicable roles and responsibilities in relation to filtering and monitoring. The designated safeguarding lead takes lead responsibility for understanding the filtering and monitoring systems that are in place. In accordance with the DfE Guidance 2023, the school has effective monitoring and filtering systems as well as due regards to the DfE's Cyber security standards.

### 16.3: The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### 16.4 To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find in all student planners

## **17) RACIST INCIDENTS**

- 17.1 Our policy on racist incidents is included in the Behaviour for Progress Policy, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

## **18) HEALTH AND SAFETY**

- 18.1 Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits.

## **19) KEEPING AND ADMINISTERING MEDICINE**

- 19.1 Any student taking medicine on site should have a medical care plan. Such a plan must outline the quantities of medicine required and the frequency of administration. This should be signed by a parent. Staff should not administer medicine themselves unless fully trained and if written parental consent has been given. Any medicines should be stored in the student medicine cupboard (main reception).
- 19.2 No member of staff should offer medicine that has **not been** prescribed to an individual.

## **20) PREVENTING GROOMING AND RADICALISATION**

(See Preventing Radicalisation and Extremism Policy)

## **21) DEVELOPING BRITISH VALUES (AKA "Newman" Values)**

(See Preventing Radicalisation and Extremism Policy)

## **22) POLICY REVIEW AND STAFF TRAINING AND AWARENESS**

- 22.1 This child protection policies will be updated annually. The headteacher should update the content of staff training regularly.
- 22.2 The Governing Body of our school is responsible for ensuring the annual review of this policy, and for reporting back to the LA.
- 22.3 Stipulations for staff training are outlined in Appendix C. Induction training for new staff is conducted to ensure they are fully aware of all school policies, including this Safeguarding and Child Protection Policy.
- 22.4 Staff training will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- 22.5 Staff training will have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils
- 22.6 Access to this policy by staff, parents, carers and governors is primarily through the school website ([www.ncc.brent.sch.uk](http://www.ncc.brent.sch.uk)). Within school, summary posters and bullet pointed information on staff lanyards provides a visual and immediate reference point for all stakeholders.
- 22.5 Staff should speak to the DSL (or any safeguarding officer) and follow this child protection policy if they have concerns about a child.

## **23) ASSOCIATED POLICIES;**

- 23.1 E-Safety policy; First Aid policy; Attendance policy; Behaviour for Progress policy; Health and Safety policy; Equality policy; Guidance and School policy for trips; Anti bullying policy; Preventing Extremism and Radicalisation policy; Whistleblowing Policy; Designated teacher for looked-after and previously looked-after children

## **24) APPENDIX**

### **APPENDIX A – FOUR CATEGORIES OF ABUSE**

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

**B) NEGLECT** – Such abuse may include:

- 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
- It may occur during pregnancy as a result of maternal substance misuse.
- It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.
- It also includes parents or carers failing to:
  - Provide adequate food, clothing and shelter including exclusion from home or abandonment
  - Protect a child from physical and emotional harm or danger
  - Ensure adequate supervision including the use of inadequate care-givers
  - Ensure access to appropriate medical care or treatment

**C) EMOTIONAL ABUSE** - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

Worthless  
Unloved  
Inadequate

- Valued only insofar as they meet another person's needs

It may include:

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

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction

It may involve:

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger

The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone

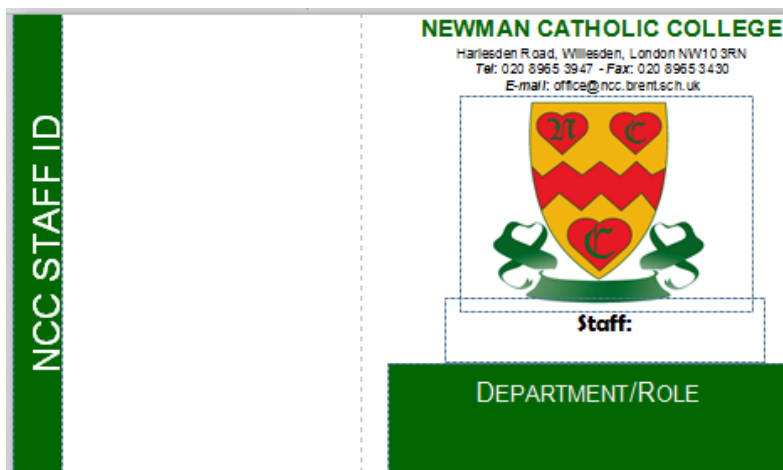
**D) SEXUAL ABUSE** – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities involving:
  - children in looking at, or in the production of, sexual images,
  - children in watching sexual activities
  - or encouraging children to behave in sexually inappropriate ways
- Grooming a child in preparation for abuse (including via the internet).
- “Upskirting” - which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sharing of nude and semi nude images (AKA - youth produced sexual imagery)
- initiation/hazing type violence and rituals

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

## **APPENDIX B: Sample Staff ID badges – FRONT and BACK**



### **Child Protection and Safeguarding Policy Summary:**

If a young person is in immediate danger of harm, call 999. Otherwise, to raise a concern or for advice, contact:

**NCC Safeguarding Team**

**Brent LCSB:**

<http://www.brentlscb.org.uk/>

**Brent Family Front Door: 020 8937**

**4300**

## **APPENDIX C – Training**

Expectations and timelines for training are as identified below:

### **All staff**

- All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated across the year and will be in line with advice from the 3 safeguarding partners.
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, if applicable.

### **13.2 The DSL, Deputy DSL and safeguarding team**

- The DSL, Deputy DSL and safeguarding team will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training.

### **13.3 Governors**

- All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- As the chair of governors may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

### **13.4 Recruitment – interview panels**

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

## Newman Catholic College: **Safeguarding and Child Protection** - Policy Summary

Safeguarding is the responsibility of every staff member at Newman Catholic College

Safeguarding is when concerns are raised about a student's welfare

Child Protection is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect.



### **Staff:**

**Must wear NCC ID at all times**

**Challenge visitors and colleagues on behaviour which contradicts safeguarding our pupils**

**Read and refer to the Safeguarding**



### **Students:**

**If you have a specific concern, please report it to either:**

**Miss Jackson;  
Ms Goodin;  
Mrs Murphy;  
Ms Saran;  
Mr Nwandison;  
Ms Englishby;  
Mr Albert;  
Mr Roche.**



### **Visitors:**

**Must sign in, at reception and wear visitor lanyard at all times on site.**

**Must adhere to the principles established in the Safeguarding and Child Protection policy**



### **Protecting students:**

- Bullying**
- Verbal Abuse**
- Physical or sexual abuse**
- E-safety**
- Grooming for Sexual Exploitation; Gangs; Extremism; (CCE/CSE)**
- Sexual Harassment or Violence**













**The full 'Safeguarding & Child Protection Policy' is available on the school website**

## APPENDIX E: Safeguarding Poster 2023-24

### Safeguarding at Newman

pagbabantay saivaguarda - saivgardare - zabezpieczenie - रक्षा करना -- المصون

Keeping you safe is everyone's responsibility at Newman. If you are worried, scared or want to talk to an adult. We have specially trained staff available to support you. E-mail any concerns to [safeguarding@ncc.brent.sch.uk](mailto:safeguarding@ncc.brent.sch.uk) (School time only). If you are in immediate danger, call 999.

 <b>Ms S Jackson</b> Safeguarding Lead AHT	 <b>Ms B Goodin</b> Deputy Safeguarding Lead - MHL, LLM	 <b>Ms S Murphy</b> Deputy Safeguarding Lead (KS4) - DHT	 <b>Ms J Englishby</b> Designated Care Lead Safeguarding Officer	 <b>Mr J Roche</b> Lay Chaplain Safeguarding Officer
 <b>Ms A Saran</b> PSM - EAL Pathways Refugee Coordinator	 <b>Mr C Albert</b> Dept Head of Sixth Safeguarding Officer	 <b>Mr D Nwandison</b> Deputy Safeguarding Lead (KS3) - AHT	 <b>PC Gary Weedon</b> Safer Schools Officer Brent Police	<div><p>NCC Safeguarding information: Scan the QR code</p></div>

**Contact Information** – Out of school time, in holiday time, please contact the following:

- Childline: Tel – 08001111 (Free); [www.childline.org.uk](http://www.childline.org.uk)
- Mosaic LGBT Youth Centre - [mosaicyouth.org.uk](http://mosaicyouth.org.uk)
- Samaritans: Tel – 116 123 (Free); [www.samaritans.org](http://www.samaritans.org)
- Brent Family Front Door  
<https://www.brent.gov.uk/children-young-people-and-families> - Tel - 020 8937 4300

## APPENDIX F: Specific Safeguarding Issues

### Children missing from Education (CME)

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

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

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

- Come from new migrant families

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

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

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

### **Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

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

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial

advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

## **Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

We define domestic abuse as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common. In the vast majority of cases it is experienced by women and is perpetrated by men.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse

- Physical or sexual abuse
- Financial or economic abuse
- Harassment and stalking
- Online or digital abuse

## **Homelessness**

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

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

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

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

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

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

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

## **FGM**

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period

- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

### **Forced marriage**

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

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

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

The DSL will:

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

## Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](https://www.educate-against-hate.org/) and charity [NSPCC](https://www.nspcc.org.uk/) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views



- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Further information on the school's measures to prevent radicalisation are set out in the Preventing Radicalisation and Extremism policy.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)



Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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

All visitors will be required to verify their identity to the satisfaction of staff, sign into our INVENTORY system, and to take responsibility for their own belongings during their visit. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

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

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will inform the parents immediately, and assign staff to search the site (and CCTV) to ascertain their whereabouts. Our Safer Schools Officer will be informed where necessary.

## **APPENDIX G: safer recruitment and DBS checks – policy and procedures**

### **Recruitment and selection process**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

### **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references

- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

### **Pre-appointment vetting checks**

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

#### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

### **Contractors**

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

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

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

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

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

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

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

### **Trainee/student teachers**

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

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

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Governors**

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

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

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

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

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

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

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

### **Pupils staying with host families**

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

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

## **APPENDIX H: ALLEGATIONS OF ABUSE MADE AGAINST STAFF**

### **Section 1: allegations that may meet the harms threshold**

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A ‘case manager’ will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

Suspension of the accused 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 there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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



- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### 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, or to cause harm to the subject of the allegation
- **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 case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- 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

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **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. Trade union representative advice, in school counselling and Brent HR support for staff are available where 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 (only in relation to their child – no information will be shared regarding the staff member)
- 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 school 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 teachers and all contracted staff**

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, 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 LADO 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**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **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 school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider 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, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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 LADO, 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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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.

## **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager 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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## **Section 2: concerns that do not meet the harm threshold**

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

Concerns may arise through, for example:

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

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

### **Definition of low-level concerns**

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Shaking hands (or alternative i.e. elbow or fist bump) as a greeting
- Speaking to a student in the street in public, in passing
- Emailing a student about schoolwork using NCC addresses only (i.e. not personal email addresses)
- Conversing with a student at break and lunch (minimum of one adult present)
- Rewarding a student as per the NCC policy

Any low-level concerning behaviours which exceed these expectations may be extensions or developments of the above, such as being overly friendly with students, being in a one-to-one situation when secluded, using inappropriate language etc.

### **Sharing low-level concerns**

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school’s safeguarding system

### **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

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

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

### **Record keeping**

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

Records will be:

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

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

### **References**

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

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