



# Child Protection Safeguarding Policy

Policy Title:	Child Protection Safeguarding Policy
Implemented:	July 2001
Last Review:	December 2025
Next Review:	August 2026
Responsibility:	Designated Safeguarding Lead, Headmaster
Other relevant policies:	Anti-Bullying Policy E-Safety and Web Filtering Policy No Platform for Extremism Policy Off-Site Activities and Educational Visits Policy Pupil Behaviour Policy Pupil Restraint Policy Recruitment, Selection and Disclosure Policy Staff Code of Conduct Whistleblowing Policy

## Scope

This policy applies to the whole school including EYFS. It has been compiled with regard to and is in accordance with several extensive documents on safeguarding which have been issued by the Secretary of State and Central Government, and has regard to:

- *Keeping Children Safe in Education (KCSIE)* (2025) which incorporates
  - *Disqualification under the Childcare Act 2006* (August 2018)
  - *What to do if you're worried a child is being abused* (March 2015)
  - *Sexual Violence and Sexual Harassment between Children in Schools and Colleges* (DfE, September 2021).
- *Working Together to Safeguard Children* (2025) and *Information Sharing* (2024)
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education* (Updated 2025)
- *General Data Protection Regulation, the Data Protection Act* (2018)
- *Prevent Duty Guidance for England and Wales* (2024). Prevent is supplemented by non-statutory advice and a briefing note:
  - *The Prevent Duty: Departmental advice for schools and childminders* (June 2015)
  - *The use of social media for on-line radicalisation* (July 2015)
- *Mental Health and Behaviour in Schools: Departmental Advice* (DfE 2014, updated 2018)
- *Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges* (2024)
- *Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance* (2018)
- *The Children and Social Work Act* (2017)

It also embraces the procedures of Birmingham Safeguarding Children Partnership (BSCP), operating in accordance with the agreed inter-agency policy of Birmingham City Council. In particular, it has regard to BSCP publication *Right Help, Right Time– Delivering effective support for children and families in Birmingham* (February 2020) which provides details of the local criteria for action and the local protocol for action.

The policy applies to all staff and volunteers working in the school, including those working in the EYFS, as well as governors and peripatetic teachers. It is an expectation of the school that visitors adopt the safeguarding principles contained herein. The policy is made available to parents via the school website, with hard copies also available from the school office on request.

## Key Contacts

The contact details for referrals for all pupils are detailed below. The normal referral procedures detailed in this policy apply to all referrals including those initiated as a result of a concern about children who may be at risk of being influenced by associations with the promotion of radicalisation;

### Birmingham Safeguarding Children Partnership

0121 464 2612 [www.lscpbirmingham.org.uk](http://www.lscpbirmingham.org.uk)

### Birmingham Children's Trust

0121 303 1888

### Children's Social Care Emergency Duty Team

0121 675 4806 (In an emergency, outside normal office hours)

### Local Authority Designated Officers (LADOs)

0121 675 1669 [ladoteam@birminghamchildrenstrust.co.uk](mailto:ladoteam@birminghamchildrenstrust.co.uk)

### Multi-Agency Safeguarding HUB (MASH)

0121 303 1888 [MASH@birmingham.gov.uk](mailto:MASH@birmingham.gov.uk)

### Early Years and Childcare Team

0121 303 2605

### Birmingham CAF Coordinator

0121 303 2291

### Disclosure and Barring Service

DBS Customer Services

Royal Wootton Bassett SN4 4HF

### Local Authority *Prevent* Lead and WRAP Training

0121 303 7682

### Local Police

101 (non-emergency)

### DfE Helpline

0370 000 2288

### NSPCC Whistleblowing Advice line

Call [0800 028 0285](tel:08000280285)

Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## West House School - Specific Responsibilities

Role	Staff Member
Designated Safeguarding Lead	Mrs Paula Cusack
Deputy Designated Safeguarding Lead	Mrs Georgina White
Deputy Designated Safeguarding Lead	Mr Oscar Lyttle
Deputy Designated Safeguarding Lead	Mr Callum Williamson
Deputy Designated Safeguarding Lead EYFS/OOHC	Ms Avril Walsh
Deputy Designated Safeguarding Lead Holiday Club	Mrs Ana Zerelli
Deputy Designated Safeguarding Lead Holiday Club	Ms Michelle Mardenborough
Governor Responsible for Safeguarding	Mrs Amandeep Hayer

Chairman of the Board of Governors	Mrs Charlie Ashley
Data Protection Officer	Mrs Jo Robinson

Mrs Cusack is the Senior DSL and a member of the Senior Management Team. Mrs Cusack also holds the positions of *Prevent* Single Point of Contact (SPOC), Right to Respect Lead and Senior Mental Health Lead including the Mental Health First Aid qualification.

Mrs White, Mr Lyttle Jnr and Mr Williamson support Mrs Cusack as Deputy Designated Safeguarding Leads.

Ms Walsh is the Deputy Designated Safeguarding Lead with Early Years Responsibility and OOHC (Out of hours care, Nursery and School Holiday Club). Ms Walsh works closely with Mrs Cusack.

Mrs Zerelli and Mrs Mardenborough are also DDSLs on hand throughout the day but with specific responsibility for the Holiday Club provision.

The Senior DSL is most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

Mrs Cusack carries out an internal safeguarding review every term and meets with Amandeep Hayer (school safeguarding governor) for a meeting before the full board meeting on three occasions throughout the academic year. Mrs Cusack completes the section 175 audit each academic year and Avril Walsh completes the Nursery online audit. The whole safeguarding team meet regularly with the Senior DSL and safeguarding governor for a group supervision/discussion session.

## The School's Commitment to Safeguarding Children and Promoting Their Welfare

Birmingham Safeguarding Children Partnership states that there are seven guiding principles of safeguarding as follows:

- Have conversations and listen to children and their families as early as possible;
- Understand the child's lived experience;
- Work collaboratively to improve children's life experience;
- Be open, honest and transparent with families in our approach;
- Empower families by working with them;
- Work in a way that builds on the families' strengths;
- Build resilience in families to overcome difficulties.

Against this backdrop, the school and the Board of Governors are committed to and responsible for:

1. Ensuring that a member of the full Board is nominated to take leadership responsibility for the school's safeguarding arrangements.
2. Ensuring that the Senior DSL is a suitably experienced and qualified member of the Senior Leadership Team.
3. Ensuring that all staff and governors are familiar with the Senior DSL, DSL and the DDSLs and their roles.
4. Ensuring that the Board itself complies with its duties under legislation and that policies, procedures and training in the school are effective and comply with the law. This includes an awareness of the Board's obligations under the Human Rights Act 1998 21, the Equality Act 2010 22 (including the Public Sector Equality Duty 23), and the local multi-agency safeguarding arrangements.
5. Ensuring that parents are made aware that a copy of this document is available for inspection in the school office and on the school website.
6. Ensuring that all members of staff are properly inducted, informed, trained and supported. All members of staff, including trainees, volunteers, etc. will have access to this policy via the staff handbook and the school intranet, as well as the appropriate training and briefings.
7. Ensuring that all members of staff and volunteers read, understand and follow Part One of KCSIE or Annex A, the Staff Code of Conduct and the Whistleblowing Policy as well as receiving a copy of this document.
8. Ensuring that all those who work directly with children, including members of the leadership team read, understand and follow Annex B of KCSIE.
9. Ensuring that all new members of staff receive training of at least one hour's duration on Safeguarding, directed by the Headmaster or the DSL.
10. Ensuring that all staff will be required to acknowledge that they have read and understood this policy and the responsibility it places upon them and the school.
11. Ensuring that members of staff, including the Headmaster, receive formal training every three years and regular updates. The training of staff will extend to guidance designed to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil (see the Staff Code of Conduct).
12. Ensuring that the DSL and her deputies receive updated training every two years including inter-agency working and prevent.
13. Keeping appropriate records of concerns about children (noting the date, the event and action taken) in a secure location.
14. Ensuring that the duty of care towards pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assisting staff to monitor their own standards and practice in accordance with the requirements laid out in the Staff Code of Conduct.
15. Working in close collaboration with Birmingham Safeguarding Children Partnership, ensuring that this policy is in accordance with government guidance and reflects locally agreed inter-agency procedures.
16. Identifying and remedying any deficiencies or weaknesses in child protection arrangements without delay.
17. Ensuring that all staff who come into contact with pupils have relevant and recent DBS checks and that assurances are obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site.
18. Operating safe recruitment procedures (including appropriate DBS and pre-appointment checks and compliance with Independent School Standards Regulations) which extend to any staff employed by another organisation and working with the school's pupils either on or off the school site. See the Recruitment,

Selection and Disclosure Policy for details about the policy and procedures regarding the safe recruitment of staff.

19. Ensuring that safeguarding and child protection are at the forefront and underpin all aspects of process and policy development with the best interests of the child at their heart.
20. Ensuring that all staff place the safety and welfare of children at the top of their priorities, listen to children and provide early help.
21. Raising pupil awareness of safeguarding issues, including online safety and those associated with online learning, through the delivery of the curriculum and in assemblies.
22. Reviewing the effectiveness of the school's filters and monitoring systems in respect of online safety. The Board should ensure that the Senior Leadership Team and relevant staff are: aware and understand the systems in place, manage them effectively and know how to escalate concerns when identified.

In the EYFS the school and the Governors will specifically:

1. Designate a practitioner to take a lead responsibility for safeguarding children within the EYFS setting and liaising with local statutory children's agencies as appropriate. Ms Avril Walsh holds the position, DDSL with Early Years Responsibility.
2. Ensure that the use of mobile phones is not permitted within the EYFS setting (including outdoor areas), other than in the staff room on the lower ground floor where no pupils are permitted. Staff are required to leave their phones in this room. All photographs of activities must be taken on cameras provided by the school and uploaded to the school network. Under no circumstances should photographs be uploaded to personal computers or taken using personal devices.
3. Inform Ofsted of any allegations of serious harm or abuse by any person living with, working with, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place at the premises. Ofsted will also be informed of the action taken in response to such allegations as soon as reasonably practicable, but at least within 14 days.
4. If appropriate, the school will contact the relevant Early Years Consultant for the Early Years and Childcare Team on 0121 303 2605. In an emergency, outside normal office hours, the school will contact the Children's Social Care Emergency Duty Team on 0121 675 4806.

All Members of the Board of Governors are aware of the school's safeguarding procedures and receive a report of any training undertaken by members of staff.

The Board of Governors will be informed of any incident involving the use of safeguarding procedures and will carry out annual review.

### **The Role of The Headmaster**

The Headmaster is responsible for:

1. The overall management and co-ordination of safeguarding and child protection procedures.
2. Creating and maintaining a culture in which all staff, volunteers and contractors feel able to raise concerns about poor or unsafe practice towards children and that such concerns are appropriately dealt with.
3. Ensuring that all policies and procedures formally adopted by the Board of Governors are fully implemented, understood and followed by all staff.
4. Ensuring that all staff have access to a copy of KCSIE and confirm that they have read sections relevant to their jobs.
5. Ensuring that staff understand the KCSIE document and follow its requirements as highlighted within this and associated policies.
6. Ensuring that the Recruitment, Selection and Disclosure Policy is followed without compromise.
7. To ensure that the Staff Induction Policy is followed.
8. Support and supervision of the DSL and her deputies.
9. Ensuring that staff are aware of their responsibilities under the Prevent Duty.
10. Ensuring that sufficient time and resources are made available to those with specific responsibilities in respect of safeguarding and child protection.

11. Ensuring that the school's policies and procedures read, understood and followed by all staff. Teaching Regulation Agency.
12. Ensuring that the Disclosure and Barring Service is informed of any cases where a person is dismissed or has left due to risk or harm to a child and, in the case of teachers, that the school gives due consideration to referring the matter to the Teaching Regulation Authority (TRA) to consider prohibiting the individual from teaching.
13. Reinforcing with parents the importance of children being safe online. Information will be shared with parents in respect of the following: what systems are in place to filter and monitor online use, what the school is asking pupils to do online (including the websites they will be asked to access) and who (if anyone) from the school their child is going to be interacting with online.

## **The Role of the Senior DSL**

The Senior DSL is responsible for maintaining an overview of safeguarding within the school, to open channels of communication with local statutory agencies, manage referrals, support staff in carrying out their safeguarding duties, to monitor the effectiveness of policies and procedures in practice and to ensure that child protection files and entries are kept up to date.

The DSL and her deputies have a responsibility to ensure that all staff are made aware of the fact that safeguarding incidents/behaviours can be associated with factors outside the school and/or can occur between children outside school, otherwise known as Contextual Safeguarding.

The specific responsibilities of the DSL include:

1. Overseeing the work of her deputies.
2. Providing advice and support to other staff on child welfare, safeguarding and child protection matters.
3. Taking part in strategy discussions and interagency meetings and/or contributing to the assessment of children.
4. Acting as the Designated Teacher for Looked After Children.
5. Acting as the Single Point of Contact (SPOC) in respect of the Prevent Duty.
6. Acting as the Right to Respect Lead.
7. Acting as the Mental Health Lead.
8. Acting as Operation Encompass Key Adult.
9. Ensuring that either she or one of her deputies is available within the school day.
10. Encouraging and promoting a culture of listening to children and taking account of their wishes and feelings in all measures that are put in place to protect them.
11. Receiving safeguarding and child protection concerns from staff via CPOMS and acting as a source of support, advice and expertise.
12. Deciding what steps the school should take when there are concerns about a child and advising/informing the Headmaster as appropriate.
13. Liaising with staff on matters of safety, welfare and safeguarding.
14. Referring cases of suspected abuse or neglect or allegations to Local Authority children's care and other potential investigating agencies such as the police.
15. Supporting staff who make referrals to Local Authority social care.
16. Working with the Local Safeguarding Children Partnership in line with 'Working Together to Safeguard Children'.
17. Attending Prevent Duty training and disseminating any learning or developments to colleagues in the school.
18. Liaising with the Headmaster regarding concerns about staff, volunteers or contractors.
19. Informing the Headmaster of any ongoing issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
20. Understanding and undertaking the process for providing Early Help Assessment and any subsequent intervention for the child and the family through a multi-agency approach.
21. Overseeing the delivery of an appropriate Early Help Assessment response where there is not evidence of a significant risk to the child.
22. Ensuring that the child's voice is paramount within a solution focused practice framework.
23. Utilising the assess, plan, do and review model for reviewing any support plans.

24. Following the Early Help Assessment tool and, where appropriate, seeking advice from the Children's Advice and Support Service (CASS)
25. Assisting in the referral of a 'Child in Need'
26. Disseminating information on a 'need to know' basis.
27. Taking responsibility for the online safety of children supported by DDSLs and the Head of ICT.
28. Maintaining detailed, accurate and secure written records of referrals and concerns.
29. Promoting the welfare and educational needs of children whom are looked after or who have been previously looked after and undergoing appropriate training for this role.
30. Carrying out induction safeguarding training with new members of staff and volunteers.
31. Providing annual updates to staff in relation to safeguarding including refreshers on how to access the CPOMS system.
32. Informing relevant staff in the event that child protection related information is received in respect of a pupil joining the school.
33. Forwarding child protection files to a receiving school in a secure manner as soon as possible and within 5 days of a pupil leaving the school in-year or within 5 days of the start of a new term to allow the new school to have support in place for when the child arrives.
34. Liaising with the Safeguarding Governor at least termly and providing a report to the Board at least three times a year.
35. Completing the annual Section 175 self-assessment audit for the Local Authority.
36. Encouraging and fostering the positive involvement of parents and carers in respect of pupil welfare matters as appropriate.

### **The Role of the DDSL with Early Years Responsibility**

This scope covers all previously defined roles above for Early Years Foundation Stage (EYFS) children and extended care services—including out-of-hours provision and holiday clubs—for those aged six months to eleven years. The Deputy Designated Safeguarding Lead (DDSL) with Early Years Responsibility must ensure that a Deputy DSL is appointed and available to assume safeguarding responsibilities during her absence across both EYFS and out-of-school care. Additionally, the DDSL with Early Years Responsibility is accountable for implementing and maintaining full compliance with every requirement introduced by the latest reforms, including robust safeguarding procedures, comprehensive staff training, and ongoing monitoring of welfare standards.

- From 1 September 2025, all EYFS-registered providers must comply with strengthened safeguarding and welfare requirements.
- Formalise existing best practice and elevate child protection standards.
- Implement mandatory safer recruitment checks, including written references obtained before employment.
- Replace the term "Lead Practitioner" with "Designated Safeguarding Lead" to clarify accountability.
- Establish robust absence monitoring with prompt follow-up of unexplained absences.
- Maintain an attendance policy that includes multiple emergency contacts.
- Enforce close supervision during meals to prevent choking and allergy incidents.
- Ensure safeguarding training meets the new Annex C minimum standards, with a refresh every two years.
- Provide full paediatric first aid training for all trainees within staffing ratios.
- Adopt toileting and nappy-changing protocols balancing children's privacy with appropriate oversight.

### **Ethos, Philosophy and the Law**

West House School's Child Protection Safeguarding Policy is founded on the philosophy that the welfare of the child is paramount and that a civilised society should have the protection of children from significant harm as a top priority. It embraces in its entirety the definition of safeguarding as:

- Protecting children from maltreatment;
- Preventing impairment or children's health or development;

- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best life chances.

The school makes every effort to produce and maintain an ethos in which the children feel safe, secure and experience a sense that they are listened to. As a small school, all members of staff have day-to-day knowledge of, and contact with, all pupils. They are, therefore, well placed to identify concerns and offer support to children in need. The school will always act in the best interests of the child.

Staff must at all times be vigilant to the signs and symptoms of child abuse and, if they have any concerns about a child's welfare, act upon them immediately. The school ensures that all children know that they may approach a member of staff if they are worried or in difficulty and contact details for external agencies such as Childline and the NSPCC are clearly displayed throughout the site.

However, the school also recognises that some children may become victims of abuse, neglect and radicalisation. Clear procedures are laid out hereafter to deal with allegations of abuse or suspected cases of abuse, in whatever form they may take.

Section 175 of The Education Act 2002 states that schools have a legal obligation to report concerns to the Social Services.

The Children's Act of 1989 lays a duty on the local authority to provide services for children in need. West House School is aware of the role of these social services and will endeavour to build up good relationships with the necessary outside agencies in order to secure effective co-operation in cases of actual or suspected abuse.

There is a duty on behalf of the school to act in all circumstances and to inform the relevant social services department in accordance with the procedures of Birmingham Safeguarding Children Partnership and those laid out hereafter. The social services department may choose to investigate such cases in order to prevent significant harm or remove the risk of significant harm. The term covers ill-treatment and impairment of health or development. This may fall into one or more of the following categories:

- neglect
- physical injury
- sexual abuse
- emotional abuse

West House School recognises that significant harm may take place in a number of environments and situations including:

- within the family
- in a peer group
- from a carer
- from a teacher

### **Types of Child Abuse and Neglect**

Most children suffer harm from within their own families or from someone they know or with whom they have formed a relationship. There are four main types of harm – physical, sexual, emotional and neglect. The types of harm to children are not stand-alone issues but often overlap. It is also important to distinguish between “actual” significant harm and the likelihood of significant harm. Staff do not have to wait for an incident if they believe a child might be significantly harmed in some way. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

Child abuse can be divided into several categories:

- **Persistent or severe neglect**  
A lack of the basic care that children need to survive. This can include the failure to protect the child from danger, cold, starvation and the failure of care resulting in significant impairment of health or development. It includes leaving children unsupervised for unnecessarily long periods of time or in potentially dangerous circumstances.



- **Physical abuse or injury or the failure to prevent physical injury**  
This can include hitting, shaking, squeezing, scalding, biting, giving children poisonous substances, inappropriate drugs and alcohol, suffocation and drowning.
- **Sexual abuse**  
Actual or likely sexual exploitation of a child by any person able to exercise dominance. This may include all forms of actual or attempted sexual intercourse and involvement in the production of pornographic material and importuning. This can also include the sexual abuse of a child by a child.
- **Emotional abuse**  
Caused by persistent or severe emotional ill-treatment or rejection in which children are made to feel unwanted, ugly, worthless or unloved. It can include threats, verbal attacks, taunting, shouting, or a constant lack of love or affection, which lead to a child's loss of confidence or self-esteem. As all abuse involves some form of emotional ill-treatment, this category should be used when it is the main or sole form of abuse.

The school recognises that there are a number of additional specific safeguarding issues of which staff must be aware:

- **Child Abduction and Community Safety Incidents**  
Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Staff must be aware that child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. The school office holds full details of those authorised to collect children from school.

Pupils are also given practical advice about other community safety incidents such as how to respond to people loitering nearby or unknown adults engaging children in conversation, as well as how to keep themselves safe. Lessons must focus on building children's confidence and abilities rather than warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

- **Children and the Court System**  
Children are sometimes required to give evidence in court and a specific guide is available to support children aged 5 -11. The Ministry of Justice has also produced an online information tool with clear and concise information on the dispute resolution service following parental separation.
- **Children who are absent from education**  
A child who is absent from education is a potential indicator of abuse or neglect, including sexual exploitation, FGM, forced marriage or travelling to conflict zones. School staff are alert to these safeguarding concerns when a pupil goes missing for an extended period, or on repeat occasions.

The school recognises its duty to notify the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of ten days or more. Details of circumstances under which the school will notify the local authority of a pupil having been deleted from the admissions register appear in the Admissions and Attendance Register Policy.

Where reasonably possible, the school will hold more than one emergency contact number.

- **Children with Family Members in Prison**  
Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.
- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**  
Both CSE and CCE are forms of abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from

opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. As well as being physical, exploitation can be facilitated and/or take place online.

- **County Lines and/or Gangs**

County Lines is a term used to describe gangs and organised criminal networks involved in exporting drugs into one or more than one area(s) within the UK, using dedicated mobile phone lines or other form of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money.

**Serious Violence**

All staff should be aware of the indicators that which may signal that children are at risk from, or involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexpected injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Advice can be found in the Home Office's 'Preventing Youth Violence and gang Involvement' and 'Criminal Exploitation of Children and Vulnerable Adults: County Lines'

- **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, force criminality and the removal of organs.

Details on how to refer an individual to the National Referral Mechanism (NRM) is available in the Modern Slavery Statutory Guidance – Modern Slavery: how to identify and support victims via [www.gov.uk](http://www.gov.uk)

- **Cybercrime**

Cybercrime can take a number of forms but might include illegal 'hacking', denial of service or making malware (malicious software) with the intention of committing further offences. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL should consider referring into the Cyber choices programme. Advice can be found at 'Cyber Choices, NPCC – When to call the Police' and the National Cyber Security Centre – NCSC.gov.uk

- **Domestic Abuse (DA)**

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

All children can be adversely affected by domestic abuse through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

- **Homelessness**

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. Should there be any concerns the DSL or her deputy should contact the Local Housing Authority. However, a referral to social care should also be made if the child has been harmed or is at risk of harm.

- **'Honour Based' Abuse (HBA) including Female Genital Mutilation (FGM) and Forced Marriage**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse and should be handled and escalated as such. If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should inform the DSL or the DDSL.

The school recognises its mandatory reporting requirement in respect of female genital mutilation. Staff are supported in recognising circumstances under which an act of FGM may have taken place, chiefly through the dissemination of information at staff meetings.

When a member of staff has reasons to suspect that an act of FGM has been carried out on a pupil, the situation will be discussed with the DSL, who may consult Birmingham Safeguarding Children Partnership before making a report to the police under the mandatory requirement.

If a teacher discovers, during the course of their work, that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must inform the DSL and report the matter to the police.

### **Safeguarding Pupils who are Vulnerable to Radicalisation**

There are a number of local and national examples of attempts by extremist groups to radicalise vulnerable children and young people to hold extremist views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

West House School is clear in its stance relating to such radicalisation and exploitation. Such instances will be viewed as safeguarding concerns and the school will exercise its safeguarding duty to protect children from the risk of radicalisation. Definitions of radicalisation, and extremism, and indicators of vulnerability to radicalisation appear in Appendix B.

The school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamic ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

### **Risk Reduction**

The Board of Governors, the Headmaster and the DSL will assess the level of risk within the school and implement actions to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of the premises by external agencies, integration of pupils by SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy. This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and Birmingham Safeguarding Children Partnership.

### **Response**

Under section 26 of the Counter Terrorism and Security Act 2015, the school has 'The Prevent Duty'. Should staff have concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should inform the DSL in her capacity as the school's SPOC (*Prevent* Single Point of Contact).

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationship or drug/alcohol issues.

If there is evidence of extremism or radicalisation in the school, either amongst the children, parents, staff or Governors, the Headmaster or the Deputy Head will inform West Midlands Counter Terrorism Police on 0800 789 321. The school would also consider whether it would be appropriate to make a referral of an 'at risk' individual to the Channel Programme. This focuses on providing support to people identified as being at risk of radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

### **Children and Young People Who Abuse Other Children – 'Child on Child Abuse'**

The school recognises that children are vulnerable to abuse by one or more of their peers whether inside or outside school or online and that pupils with SEND may be particularly vulnerable. Abuse that occurs outside school or online will be treated equally seriously to that which might take place in school.

While it is more likely that girls will be the victim of sexual violence and sexual harassment and more likely that it will be perpetrated by boys, the school also recognises that sexual violence and sexual harassment can occur between two children of any age and sex and has a zero-tolerance to approach to all child on child abuse.

Staff should not dismiss abusive behaviour such as the passing of abusive comments as 'banter', 'having a laugh' or 'part of growing up'. In particular, it is unacceptable to pass abusive behaviour off as 'boys being boys' as this can lead to a culture of unacceptable behaviour and an environment that is unsafe for children. Likewise, the following should not be tolerated as being normal between young people and staff should ensure that they maintain an appropriately low threshold before taking action in accordance with this policy and the Anti-Bullying Policy:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nude and semi-nude images and /or videos (also known as sexting or youth-produced sexual imagery);
- 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;
- Initiation/hazing type violence and rituals;
- Upskirting

The school also acknowledges the need to be aware of the fact that abuse can take place within intimate personal relationships. The relationships between pupils are closely monitored and the school actively engages parents in monitoring the behaviour of their children with particular regard to the sharing of nude and semi-nude images and/or videos.

The school also recognises that, even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.

The risk of child on child abuse is minimised in the following ways:

- By ensuring that pupils are appropriately supervised in accordance with the relevant policies;
- Through raising pupil awareness of what constitutes child on child abuse via assemblies and the delivery of the PSHE curriculum, supported by visiting speakers and agencies as appropriate;
- Through challenging abusive behaviours between peers;
- Through actively encouraging pupils to report abuse by speaking to any adult and highlighting those adults who have specific responsibilities such as the DSL and members of the leadership team.

Should staff suspect child on child abuse is taking place, any concerns should be raised with the DSL who will maintain a record of the concern and carry out an investigation if deemed to be appropriate. Details of the investigation and any action taken will be retained on the Child Protection file. Throughout the entire process, support for victims, perpetrators and any other children affected will be paramount and led by the DSL and her team.

Should a member of staff receive a report of child on child sexual violence and sexual harassment, they must be aware of the importance of their role in the local early help process and refer the matter immediately to the DSL or one of her deputies and follow the procedures laid out hereafter in regard to a child making a disclosure. Victims of sexual violence or sexual harassment should be reassured that they will be supported and should in no way feel ashamed for making a report.

Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' as a result of child on child abuse, the matter is taken as seriously as abuse by adults and is subject to the same child protection procedures.

In such instances, the needs of the victim and the needs of the alleged aggressor will be considered separately, though both perpetrator and victim will be considered to be 'at risk'. The DSL will take appropriate action, which may involve consultation with and referral to local agencies as a child protection concern. This may be the case if the evidence suggests that there was an intention to cause severe harm to the victim or where the aggressor has repeatedly tried to harm one or more other children.

In addition to safeguarding the identified victim, the DSL will request that appropriate external agencies consider whether the alleged aggressor poses a risk to any other children.

In the event of the school becoming aware of a pupil engaging in sexual activity, the DSL will immediately notify social services.

All staff have a duty to inform the Headmaster and the DSL should they have any concerns relating to potential and perceived abuse of any pupil by another young person.

### **Looked After and Previously Looked After Children**

The Board of Governors will appoint a designated teacher to promote the welfare and progress of any pupil who is 'Looked After'; the person would normally be the DSL. The school will ensure that the member of staff is suitably trained and supported and has access to all relevant information about the care arrangements and support structure for the pupil. In so doing, the school will liaise closely with the local authority to establish that it is party to up to date assessment information, the most recent care plan, contact arrangements with parents and delegated authority to carers. The appointed person will be made aware of the statutory guidance to local authorities – 'Promoting the Education of Looked After Children'.

Previously looked after children (such as those who have left care through adoption, special guardianship or child arrangement orders) potentially remain vulnerable and staff will be made aware of the fact that this is the case. The DSL, in the role of designated teacher, is responsible for ensuring that all staff have the skills, knowledge and understanding to keep previously looked after children safe and will liaise with external agencies as necessary in ensuring their safety.

In the event that a young person has ceased to be looked after and become a care leaver, the DSL will ensure that the school has details of the local authority personal advisor and liaise with them as necessary regarding any issues of concern affecting the care leaver.

### **Safer Employment Practices**

West House School follows the requirements of 'Keeping Children Safe in Education' (2025) together with Government recommendations for the safer recruitment and employment of staff who work with children including new staff, supply staff, contractors and volunteers. Full details of the process of recruitment and engagement of services appear in the Recruitment, Selection and Disclosure Policy.

### **Training of Staff**

The DSL, the DDSL and other staff with specific safeguarding responsibilities will receive updated child protection training every two years. This will include local inter-agency working protocols and training in BSCP's approach to *Prevent* duties, along with training in online safety. The training content will be in accordance with the requirements set out in Annex B of KCSIE and will include inter-agency working, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children. Both the DSL and the DDSL will receive training to a level which will allow them to provide advice and support to other members of staff on protecting children from radicalisation. In the absence of being able to access local training, the DSL and DDSL will access the appropriate training module on Channel.

All staff, including the Headmaster, will attend annual training for the KCSIE and Safeguarding delivered by the DSL. An ongoing training platform (TES) will be used by all staff covering all aspects of Child Protection and Safeguarding. *Prevent* awareness training will be delivered by the DSLs. All staff will be made aware on a regular basis of the importance of robust adherence to whistleblowing procedures, as detailed in the Whistleblowing Policy. Updates will be provided during INSET, staff briefings and staff meetings.

All newly appointed governors will receive appropriate safeguarding and child protection training at induction. *Prevent* awareness training will be part of this. In the absence of being able to access local training, the member will access the appropriate training module on Channel. The Chairman of the Board of Governors and members of the Board of Governors will receive appropriate safeguarding and child protection training at regular intervals and at least every three years, providing them with the knowledge to ensure that the school's safeguarding policies and procedures are effective.

All staff are required to read Part One of KCSIE (or Annex A for those who do not work directly with children) and Annex B. Every time KCSIE is updated, existing staff will be required to read the prescribed sections of the update. Hard copies and electronic copies will be provided by the school and staff will be required to sign a statement of having read and understood the document. In the event that staff cannot read English, nor read at all, a member of the Senior Management Team will ensure that they understand key information. Safeguarding updates will be provided at staff meetings as required.

All staff will receive online safety training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

All new staff, including temporary staff and volunteers, will be provided with induction training that includes but is not confined to:

- The school's Child Protection Safeguarding Policy;

- The Staff Code of Conduct;
- The Whistleblowing Policy;
- The E – Safety Policy;
- The identity of the DSL and the DDSLs;
- A copy of Part One of KCSIE (2025) (or Annex A as described above) and Annex B;
- The school's Policy on Pupil Behaviour;

This training of new staff forms part of wider staff induction procedures and is recorded on an induction record sheet which is signed by the Headmaster/DSL and the member of staff. Further details appear in the policy on the Induction of Teaching and Non-Teaching Staff.

The DSL and DDSL will also provide informal updates to colleagues as required and at least annually in respect of safeguarding issues and prevent awareness, using resources provided by the local authority where they are available.

## **Curriculum**

Preventative education is delivered within the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance in respect of sexism, misogyny/ misandry, homophobia, biphobic and sexual violence/harassment. It will be underpinned by the school's Policy on Pupil Behaviour, the pastoral support system and through school assemblies, ICT, RE and RSE and PSHE lessons. These all include areas of learning which develop knowledge and understanding about families, the right of children to be safe and well cared for, as well as developing the ability to recognise risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet (In the EYFS such issues are covered at an appropriate level in Topic of the Week and Understanding of the World).

These topics should encourage pupils to keep themselves safe and develop good caring skills for the future. Staff are made aware that such subjects could cause distress and need to be approached with sensitivity.

Where appropriate the school makes use of resources promoted by the DfE including:

- The use of social media for online radicalisation
- The UK Safer Internet Centre ([www.saferinternet.org.uk](http://www.saferinternet.org.uk))
- CEOP's Thinkuknow website ([www.thinkuknow.co.uk](http://www.thinkuknow.co.uk))

## **Procedures**

### **Reporting Concerns about a Child – Staff Responsibilities**

There must be a whole school approach to safeguarding and it is everyone's responsibility.

All staff should be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. A child may not feel ready or know how to tell someone they are being abused. Staff who are concerned about a child's welfare and suspects that he/she is in need or at risk, they should follow the procedures laid out hereafter. If staff are unsure, they should always speak to the DSL or the DDSL.

In the event of confidences being shared or offered to someone via a disclosure, staff should be aware that, legally, a child can be interviewed only once over child protection issues. The school will never initiate an investigation. Usually, the police or social services try to ensure that the interview takes place under video conditions or, as a minimum, in the presence of an expert witness. If a child reveals that he or she has already been interviewed by a teacher, then the evidence may be regarded as contaminated. Therefore, staff must be clear about what constitutes listening to a disclosure and what constitutes an interview.

Should a child wish to make a disclosure, the teacher should be receptive and an opportunity to do so should be given priority. A child may never summon up the courage to approach an adult again if the opportunity is lost.

The teacher should never promise confidentiality beforehand as, legally, this may prove impossible. A compromise could be to say, "Naturally, I would not gossip about your secret, but, if we need help to sort it out, I may need to tell someone else." If a pupil refuses to go along with only that reassurance, the disclosure should not take place. The teacher can only suggest that the pupil takes time to think and then comes back or contacts an appropriate helpline such as the NSPCC.

A situation like this, where disclosure does not take place but there are concerns that the child is in need, should immediately be reported to the DSL (or the DDSL in her absence) either directly or via a CPOMS entry. The DSL may offer early help in the form of pastoral support or may elect to contact CASS to discuss their doubts or concerns. This may be done informally and without naming the school or the individual in the first instance. The Headmaster should be informed.

If disclosure does occur, staff should:

- Stay calm and reassuring.
- Listen quietly and believe what the child says.
- Avoid judgmental reactions and protestations, either in expression or verbally.
- Encourage the child by telling him/her that he/she was right to confide in someone, and that you will try to help him/her.
- Make it clear that you realise that what he/she is doing is hard for him/her and that you are pleased that he/she trusts you.
- Try to let the child tell his story as free narrative. Questions should be linked and open-ended, for example:
  - Has something happened to you?
  - Can you tell me what happened?
  - Where did it happen?
  - When did it happen?
  - Was anyone else present?
  - Can you tell me about it using your own words?
  - What upset you? (After being told the child was upset.)
- Make no promises.
- Find out whether they have told someone else.
- Avoid pressing for details or asking leading questions.

Following this, the matter should be referred to the DSL or DDSL via a CPOMS entry or directly who will then take the lead. Any contemporaneous notes taken should be signed, dated and passed to the DSL or DDSL. If the child is in need of early help, the DSL or DDSL will implement pastoral support and liaise with children's social care as appropriate.

In terms of the younger children (such as those within the EYFS), if a staff member notices an injury, or someone reports an incident or a child says something significant, they must refer the matter to the DSL or DDSL who should contact the CASS to discuss concerns. Again, this may be done without naming the school or the individual in the first instance. The Headmaster must also be informed.

In the event that the DSL suspects that a child has suffered significant harm or is at risk of significant harm, a referral will be made immediately to social services and the police will be contacted without delay if a crime has been committed.

However, staff should be aware that anyone can make a direct referral should circumstances require this to be the case. Parental consent is not required before making a referral to statutory agencies.

### **Confidentiality**

Confidentiality for the child, family (and any other individuals named in allegations) will be maintained. However, the duty to protect children overrides other principles with regard to confidentiality and children cannot be guaranteed absolute confidentiality when making a potential disclosure to a member of staff.

### **Supporting the Pupil at Risk**

Pupils who have suffered or who are at risk of suffering serious harm will be reported to children's social care immediately. Those who require additional support from one or more agencies will be referred for inter-agency assessment using local processes. In so doing, the school will liaise with the CASS.

The school recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of self-blame.

The school will endeavour to support the pupil through:

1. The content of the curriculum to encourage self-esteem and self-motivation.
2. The school ethos which promotes a secure, positive, supportive environment and gives pupils a sense of being valued.
3. The school's behaviour policy which emphasises the importance of supporting vulnerable pupils.
4. Record keeping and notifying Social Services of concerns.

### **Mental Health and Well-being/Pupils in Need of Additional Support and Pupils with SEND**

The school is aware of the most recent DfE advice and information which dovetails with WT and the SEND Code 2014 (updated 2020). In carrying out its duty of care the school will seek appropriate guidance from:

- Mental Health and Behaviour in Schools (March 2014, updated 2018)
- Counselling in Schools: a blueprint for the future (March 2015, updated 2016)
- Promoting Children and Young People's Emotional Health and Wellbeing (2023)

Mrs Paula Cusack (SDSL) holds a qualification Senior Mental Health Lead and is a qualified Mental Health First Aider. The well-being room provides a safe space for pupils to meet with members of the safeguarding team and for discussion and debate around controversial issues including those associated with the Prevent Duty.

The school also recognises that additional barriers can exist when recognising abuse and neglect in pupils with Special Educational Needs and Disabilities (SEND) and that these can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- Pupils with SEND being more prone to peer group isolation or bullying (including prejudiced-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

The school operates a programme of PSHE intervention designed to provide additional support to vulnerable pupils including those with SEND who might be particularly vulnerable to abuse including child on child abuse. The intervention is provided by a member of staff with experience in mental health issues. Records of the intervention are maintained.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and be sensitive to their indicators. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Should anyone have concerns relating to any individual pupil who might be in need, they may inform a member of the Senior Leadership Team who will take appropriate action. This may include:-

- Referral for PSHE Intervention;
- Referral to Senior Mental Health Lead
- Referral to the school nurse;
- Referral to the DSL or DDSL

Alternatively, they may refer the matter directly to the DSL. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and the matter referred to the DSL or the DDSL.

Attendance is a key indicator of a pupil's welfare and wellbeing. Regular monitoring of attendance enables the school to identify safeguarding concerns early and to take prompt action when a pupil's attendance falls below expected levels, ensuring that every child remains safe and supported during school hours.



The school adheres to the statutory guidance Working together to safeguard attendance, which sets out how schools must work with local authority children's services where absence indicates safeguarding concerns. This guidance became statutory in KCSIE 2025, reinforcing our duty to collaborate with external agencies when risks are identified

- where a pupil's attendance falls below 90% or there is a concerning pattern, the DSL initiates a multi-agency meeting to assess risk and agree on support measures.
- If absence persists without satisfactory explanation, the school refers the case to the local authority's Education Welfare Service and, where appropriate, Children's Social Care.
- The school maintains clear records of all actions taken, communications with families, and outcomes of referrals.

Attendance data and safeguarding actions are reviewed termly by the Safeguarding Committee. Lessons learned from trends or specific cases inform updates to school procedures, staff training, and targeted support for pupils at risk of disengagement.

## **Record Keeping**

Record should include:

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

Staff must be aware that their evidence may be vital in the event of an investigation. Therefore, notes on the disclosure should be made contemporaneously and an entry on CPOMS made as soon as possible, giving details of time, place and the number of people present. If, at any time, worrying changes are observed in a pupil, a CPOMS entry will be made. This will include the name, age, address of the pupil, with timed and dated observations describing the pupil's behaviour/appearance objectively, without added comments or interpretations. If possible, the pupil's exact words will be recorded. Contemporaneous notes will be signed and dated by the recorder and must be added to CPOMS.

## **Responding to an Allegation about A Member of Staff, Supply Staff, Volunteers and Contractors**

Details about how to respond to an allegation about a member of staff, supply staff, volunteers and contractors are set out in Appendix B.

## **Supply Staff, Temporary and Voluntary Workers**

Workers joining the school in a temporary or voluntary capacity will receive a minimum of one hour induction training in issues relating to child protection procedures and arrangements from the DSL, The DDSL, or a member of the Senior Management Team. Under such circumstances, a signed record of the training will be maintained on the individual staff file. Should training be arranged for the school staff during the period of voluntary work, volunteers will be expected to attend and will receive appropriate certification.

## **Safe ICT Usage**

The school E-Safety Policy highlights the appropriate use of ICT at school and addresses aspects of online safety which may fall within the auspices of safeguarding.

Access to the internet is filtered and monitored by the DSL and DDSLs. The school uses Smoothwall software to enhance the safety of pupils working online. This is a filtering and monitoring package which integrates into the CPOMS system.

Any inappropriate usage should be brought to the attention of the DSL immediately. Should incidents be related to issues of child protection, they will be investigated and referred as appropriate to outside agencies. Evidence such as computers will be preserved.

Keeping Children Safe in Education 2025 formally recognises Artificial Intelligence—and generative AI in particular—as a distinct online safety risk, extending its list of safeguarding harms to include misinformation, disinformation and conspiracy theories, and linking directly to the DfE’s generative AI guidance. West House incorporates AI tools into their filtering and monitoring regimes, ensuring any AI use by pupils or staff is age-appropriate, supervised by trained adults. Pupils are taught not to input personal data into generative AI platforms and to recognise when content may be AI-generated to guard against inappropriate content and identity deception.

### **The Use of ‘Reasonable Force’**

There are circumstances when it is appropriate for members of staff to use reasonable force to safeguard children. ‘Reasonable’ means ‘using no more force than is needed’ and actions may range from leading a child to safety by the arm to physically restraining a pupil to prevent violence or injury.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or medical conditions, the school will consider the risks carefully and recognise the additional vulnerability of these groups.

All episodes of staff using reasonable force will be recorded and maintained in the appropriate file.

### **Statutory Obligations**

Statutory obligations in respect of the recruitment and selection of staff are detailed in the Recruitment, Selection and Disclosure Policy, a copy of which is available on the website and from the main school office.

Statutory obligations associated with allegations against members of staff, supply staff, volunteers and contractors are detailed in Appendix A of this policy.

When a child leaves the school, the DSL will ensure that their child protection file is transferred to the new school as soon as possible and within 5 days for in-year transfers or within the first five days of the start of a new term, ensuring secure transit and confirmation of receipt. The DSL may elect to contact a receiving school in advance of a child leaving to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of any needs.

### **Review**

A review of the school’s child protection policies will take place annually, including an update and review of the effectiveness of procedures and their implementation. The review will be undertaken by the DSL and the Board of Governors. The Board will need to be satisfied that the school contributes to interagency working in line with WT through effective communication and good cooperation with local agencies. The breadth and depth of the review will be appropriately recorded.

Should any deficiencies or weaknesses in child protection arrangements become evident, they will be remedied without delay.

If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made to the school’s procedures or practice to help prevent similar events in future.

## Appendix A - Practical Guidelines for Detecting Signs of Abuse

These are important for people in regular contact with children. However, the possible indicators below are not fool proof. Great care must be taken not to jump to hasty conclusions. Staff noticing such signs should discuss them with the school's DSL. Staff are reminded that the absence of obvious physical signs or symptoms of distress does not itself indicate that abuse has not occurred.

In particular, while the school recognises that any child may benefit from early help, staff are required to be particularly alert to the potential need for early help for a child who:

- Is disabled or has specific additional needs;
- Has special education needs (whether or not they have a statutory Education and Health Care Plan or EHCP);
- Is a young carer;
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing or goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child;
- Is suffering from mental health problems which could be a sign or indicator of abuse, neglect or exploitation.

### Possible Signs of Neglect

Constant hunger; tiredness; emaciation; destructive tendencies; poor personal hygiene and clothing; frequent lateness, earliness or non-attendance at school; compulsive stealing; no carer at home; low self-esteem.

### Possible Signs of Physical Abuse

- Physical signs:  
Unexplained injuries or improbable explanations for injury; untreated or recurrent injuries; injuries with a pattern e.g. hand or finger injuries, belt marks; cigarette or other burns or scalds; bite marks; admitted injuries caused by excessive punishment.
- Behavioural signs:  
Fear of adult or carer including fear of going home; refusal to change for P.E., keeping limbs covered; fear of medical help; self-destructive tendencies; aggression towards others; sudden unexplained changes in behaviour; learning difficulties; very low self-esteem, including failure to respond to praise; inhibitions; cowering.

### Possible Signs of Emotional Abuse

Developmental delay; admission of seemingly excessive punishment; overreaction to mistakes; sudden speech disorders; rocking, hair twisting or pulling; self-mutilation; extremes of passivity or aggression; drug/solvent abuse; attention seeking; bedwetting.

### Possible Signs of Sexual Abuse

- Physical signs:  
5-12 years: urinary infections; chronic ailments; stomach pains; frequent headaches; eating disorders.
- Behavioural signs:  
Hints about secrets; saying a friend has a problem; beginning to lie, steal or blatantly cheat; unexplained sources of money; reluctance to undress for P.E.; excessive dislike of or refusal to see a particular person(s); refusal to go home; drawing of pictures depicting abuse; poor self-image; self-mutilation; taking over parenting role at home; regular running away; acting in a sexually inappropriate way for age.

## Possible Signs of Sexual Exploitation

### Significant Indicators:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours;
- Self-harm or significant changes in emotional well-being.

On the basis of careful assessment of the above factors, a decision should be made about whether there is reasonable cause to suspect that significant harm has occurred or might occur. If there is reasonable cause a referral should be made to Birmingham Safeguarding Children Board.

## **Appendix B –Definitions and Indicators of Vulnerability to Radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism

Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of the members of our armed forces, whether in this country or overseas

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts;
- Foster hatred which might lead to community violence in the UK

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities

Indicators of vulnerability include:

- Identity Crisis – the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special Educational Need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;

- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## **Appendix C - Investigation of an Allegation Against a Member of Staff, Supply Staff, Volunteers and Contractors**

The school addresses such allegations on two levels – those that may meet the harms threshold and those that do not meet the harms threshold, referred to hereafter as ‘low level concerns’.

If staff have any concerns or an allegation is made about another staff member (including supply staff, volunteers and contractors) posing a risk of harm to children this should be raised with the Headmaster without delay or entered onto the CPOMs Staff Safe system.

Should staff have concerns or an allegation is made about DSL, the matter should be reported to the Headmaster or entered onto the CPOMS Staff Safe system.

Where staff feel that there is a conflict of interests in reporting the matter to the Headmaster, they should refer it directly to the LADO.

Should staff have concerns or an allegation is made about the Headmaster, the Chairman of the Board of Governors should be informed, without first notifying the Headmaster. The contact details for the Chairman of the Board of Governors are available from the Secretary to the Board, Mrs Jo Robinson.

Where there is an allegation against the Chairman of the Governors or a member of The Board of Governors, the referral should be made to the LADO directly.

Details of the allegation will be recorded on the Investigating a Safeguarding Allegation against a Member of Staff form found in Appendix D.

### **Allegations that may meet the Harms Threshold**

This section covers allegations that might indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school or college. It covers allegations where anyone working in the school, including supply teachers, volunteers and contractors has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children (including behaviour that may have taken place outside school).

### **The Initial Response to an Allegation**

Where the school identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, children’s social care will be contacted by the DSL immediately and the police as appropriate.

Two aspects will be considered following an allegation:

- Looking after the welfare of the child – This will be led by the DSL who will ensure that the child is not at risk and will liaise with the local authority in cases of suspected abuse.
- Investigating and supporting the person subject to the allegation – A case manager will be appointed. This will be the Headmaster; in the case of the Headmaster being the subject of an allegation, the case manager will be the Chairman of the Board of Governors. The case manager will carry out basic enquiries in line with local procedures found at [lscpbirmingham.org.uk](http://lscpbirmingham.org.uk) and establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The case manager will then discuss the nature, content and context of the allegation with the LADO and agree a course of action. Throughout the entire process, discussions will be recorded in writing.

The school will:

- Apply common sense and judgement;
- Deal with allegations quickly, fairly and consistently;
- Provide effective protection and support for the person subject to the allegation.

- Inform the individual at the centre of the allegation in a sensitive and supportive manner, with guidance from the LADO, social care and the police as required.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. The DSL may liaise with children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or where any strategy discussion or initial assessment led by the LADO decides that this is the case, the LADO should discuss next steps with the case manager.

### **No Further Action**

Where the initial discussion leads to no further action, the case manager and the LADO should:

- Record the decision and the justification for it;
- Agree on what information should be put in writing to the individual concerned and by whom.

### **Further Enquiries**

Where further enquiries are required to enable a decision about how to proceed, the case manager will consult with the LADO to decide how and by whom an investigation will be undertaken. In straightforward cases, a senior member of the school staff will undertake the investigation but in more complex situations the school will secure the services of an appropriately experienced individual who is independent of the school.

The case manager will monitor the progress of the case and receive updates every two weeks. The LADO will be consulted for advice and guidance as necessary.

### **Supply Teachers and all Contracted Staff**

Where an allegation is made against someone not directly employed by the school, such as in the case of an agency worker or contracted worker employed by a business, the school will ensure that an appropriate investigation is undertaken. In the first instance, the school will establish the facts and liaise with the LADO to determine a suitable outcome. In the case of supply teachers the school will contact the agency and discuss whether it is appropriate to suspend the individual or redeploy them to another part of the school while the investigation is being carried out.

While the school will lead the investigation under the direction of the LADO, the agency or business will be expected to cooperate fully with any enquiries from the LADO, police and/or children's social care. THE individual who is at the centre of the allegation will be advised to contact their trade union representative if they have one, or a colleague for support.

The LADO may choose to arrange a management meeting to which a representative from the agency will be invited with a view to sharing information. The school will inform the agency of its processes but will also take account of the agency's own policies and procedures.

### **Governors**

Where an allegation is made against a Governor, the school will follow the procedures laid out within this policy but will also seek direction from the LADO in relation to local procedures. Should an allegation be substantiated, the Governor will be removed from office.

### **Suspension**

Suspension will not be an automatic response when an allegation is made. The case manager will consider the potential for a child or children at the school to be at risk of harm and whether or not the case is so serious that there might be grounds for dismissal. The case manager may consult the LADO, police or children's social care if they are involved before arriving at a decision of whether or not to suspend.

Where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual working at the school, immediate action will be taken to comply with the order and the individual will not carry out any teaching work. Pay arrangements during a period of suspension or where there is an interim prohibition order in place are covered within the school's pay policy.



The case manager will consider all options to reasonably avoid the suspension of an individual during an investigation and a decision to suspend will be taken in consultation with the LADO. The following alternatives to suspension will be considered by the case manager:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- Provide an assistant to be present when the individual has contact with children;
- Redeployment to alternative work so that the individual does not have unsupervised access to children;
- The possibility of moving a child or children to different classes so that they do not have contact with the individual. This would only be done in consultation with parents and as long as it does not negatively impact the child or children involved;
- Temporarily redeploying the member of staff to another role in another location.

In any decision taken, the case manager will consider the potential permanent reputational damage to employees that can result from suspension where an allegation is later found out to be unfounded, unsubstantiated, malicious or false. If immediate suspension is considered necessary, the case manager will record the rationale and justification for the decision. In so doing, details of what alternatives to suspension were considered and why they were rejected.

Where a decision to suspend is taken, this will put in writing to the individual within one working day and the reasons for the suspension will be detailed as appropriate. The individual will be offered support and given the contact details of a nominated person at the school.

Involvement of outside agencies, including the police, does not make it mandatory for a member of staff to be suspended. This is a decision for the school to make based on information and advice received. All decisions will be taken on a case by case basis and only after a risk assessment has been undertaken about whether the person poses a risk of harm to children.

### **Supporting those Involved**

The school recognises its duty of care to the child in the first instance and this will be the prime concern during the investigation. However, the school will also offer appropriate welfare support to the member of staff at what will be a very stressful time. Information will be treated in the strictest confidence and will not be shared with other staff or with children or parents who are not directly involved in the investigation.

The school will:

- Manage and minimise the stress caused by the allegation;
- Inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- Advise the individual to contact their trade union representative, or a colleague for support;
- Appoint a named representative to keep the person informed about the progress of the case;
- Provide access to counselling or medical advice where appropriate;
- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents/carers of the child or children involved will be:

- Formally told about the allegation as soon as possible. The case manager will consult with the LADO and, where involved, children's social care and the police on what information can be disclosed;
- Kept informed about the progress of the case only in relation to their child – no information will be shared regarding the staff member;
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools while investigations are in progress as set out in section 141F of the Education Act 2002.

### **Confidentiality and Information Sharing**

In an allegation management meeting or during the initial assessment of the case, all agencies involved should share all relevant information they have about the person who is the subject of the allegation and about the alleged victim.

Where the police are involved, the school will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. Relevant information should continue to be shared as the investigation proceeds as this will enable the police to share such information without delaying the conclusion of their investigation or any court case.

Children's social care should adopt a similar procedure in deciding whether the child or children named in the allegation are in need of protection or services. Again, such information should be passed to the school without delay as it may be relevant to a disciplinary case.

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The school acknowledges the reporting restrictions introduced by the Education Act 2011 preventing the release of material that could lead to the identification of a teacher in a school who is the subject of an allegation.

The school also acknowledges that the restrictions apply until:

- The point at which the accused person is charged with a relevant offence;
- The Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation;
- The teacher waives their right to anonymity.

Where the school needs to make specific parents aware of an allegation, they will be informed that there are restrictions on publishing information which includes 'any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or a section of the public'. This would include publishing details of the allegation on social media which could lead to the identification of the teacher.

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

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

## **Allegation Outcomes**

The outcome of an allegation will be defined as one of the following:

- **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 cause harm to the person who is 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. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The response of the school will range from no further action to dismissal or a decision not to use the individual's services again. If the allegation is substantiated and the person is dismissed, resigns or otherwise ceases to provide his or her services, or the school ceases to use the person's services, the school will carry out its duty to make a referral to the DBS for consideration of whether inclusion on the barred list is required.

In the case of a member of the teaching staff, the case manager will consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

The school acknowledges its legal requirement to make a referral to the DBS where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

## **Following a Criminal Investigation or a Prosecution**

The police should inform the LADO and the school immediately when:

- A criminal investigation and any subsequent trial is complete;
- It is decided to close an investigation without charge;
- It is decided not to continue to prosecute after a person has been charged.

The case manager will discuss the outcome with the LADO at a joint assessment meeting and consider whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and children's social care will also inform the decision. The options will depend upon the circumstances of the case and the consideration will take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

## **Unsubstantiated, Unfounded, False or Malicious Allegations**

If an allegation or report is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and the allegation is a cry for help. In such circumstances, a referral to children's social care might be appropriate. If the allegation or report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the Policy on Pupil Behaviour.

## **Returning to Work**

Where it is decided at the conclusion of a case that a person who has been suspended can return to work, the case manager will liaise with the LADO as necessary and offer the individual help and support after what will have been a stressful experience. This might include a phased return or the provision of a mentor to provide assistance and support in the short term. Consideration will also be given to contact with the child or children who made the allegation.

## **Managing the Situation and Exit Arrangements - Resignations and Settlement Agreements**

A settlement agreement (sometimes referred to as a Compromise Agreement) will not be used as an alternative to disciplinary action or at all where there are allegations that indicate that the person is a risk or poses a risk of harm to children or deemed to be unsuitable to work with children. The school will always meet its legal duty to refer cases to the DBS where the referral criteria are met, will always provide a reference to potential employers that is not 'agreed' with the employee and will always consider making a referral to the Teaching Regulations Agency (TRA) where the criteria are met.

The school will not cease its investigation if the person leaves, resigns or ceases to provide their services. Every effort will be made to reach a conclusion in all cases of allegations having a bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

The individual who is the subject of the allegation will be given full opportunity to answer it and make representations about it. The investigation and the process of compiling evidence will continue even if the accused refuses to cooperate. It may be difficult to reach a conclusion in these circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but the school will make every effort to reach and record an outcome wherever possible. The person concerned will be notified of the conclusion and the sanctions that might be imposed.

Other than where the allegations are false, malicious, unsubstantiated, or unfounded, the outcome will be made clear when the school provides a reference to prospective employers.

## **Record Keeping**

Details of allegations that have been found to have been malicious or false following an investigation will be removed from personal records unless the individual gives their consent for the retention of the information. However, for all other allegations, the following information will be kept on the file of the person accused:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;

- A note of any action taken, decisions reached and the outcome as categorised above;
- A copy provided to the person concerned, where agreed by children's social care or the police;
- A declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will also provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction.

The school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the inquiry. All other records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Practical advice on the retention of records can be found in the Employment Practices Code published by the Information Commissioner.

## **References**

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in employer references. Substantiated allegations will be included in references but will be factual and will not include opinion.

## **Learning Lessons**

Throughout the process in handling allegations and at the conclusion of the case in which an allegation is substantiated, the school will review the circumstances of the case with the LADO to determine whether any improvements can be made to the school's procedures to help prevent similar events in future. In particular, consideration will be given to circumstances in which suspension has been used and whether it was justified with especially when the accused has been subsequently reinstated. For all other cases the case manager will consider the facts and determine whether any improvements can be made.

## **Non-Recent Allegations**

Where an adult makes an allegation to the school that they were abused as a child, they will be advised to report the allegation to the police. Non recent allegations made by a child will be reported to the LADO. The LADO will coordinate with the police and children's social care. Abuse can be reported no matter how long ago it happened.

## **Concerns that do not reach the Harm Threshold**

The school has appropriate policies and procedures in place to deal with concerns (including allegations) which do not meet the threshold set out above. Such concerns may arise in several ways and from a number of sources. These might include: suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken. These will be dealt with under the appropriate policy which might include the Complaints Policy or by reference to the Staff Code of Conduct.

## **Low Level Concerns**

As part of the school's commitment to safeguarding, it actively promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

All concerns about adults should be shared responsibly and with the right person as laid out hereafter. All concerns will be recorded and dealt with appropriately and in a manner that reinforces the open and transparent culture of the school. This approach is intended to enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the aims, ethos and expectations of West House School.

## **What is a Low Level Concern?**

The term 'low-level' concern does not mean that it is insignificant. It means that it does not meet the threshold defined within this policy above. It is a concern 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 school; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to warrant a referral to the LADO.

Examples of such behaviour might include, but is not limited to:

- Being over friendly with children;
- Having favourites;
- Taking photographs on children on personal mobile phones;
- Engaging with a child on a one to one basis in a secluded area or behind a closed door;
- Using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum from the inadvertent and thoughtless through to what is intended to enable abuse. In all cases, it is crucial that such concerns, including those that do not meet the harm threshold, are shared responsibly and with the right person, recorded and dealt with appropriately. This approach should protect those working in or on behalf of the school from potential false allegations or misunderstandings.

### **Staff Code of Conduct and Safeguarding Policies**

Staff should be clear about how to recognise and report low level concerns and are required to have read and understood the content of this policy and the Staff Code of Conduct within which details are clearly laid out. This will ensure that appropriate action can be taken in a timely manner to safeguard children and facilitate a whole school approach to deal with any concerns. In particular, the purpose of this approach is to:

- Ensure 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;
- Empower staff to share low-level safeguarding concerns in the correct manner;
- Address unprofessional behaviour and to support the individual to correct it at an early stage;
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- Help to identify any weaknesses in the school's safeguarding system.

### **Sharing Low-Level Concerns**

If staff have any concerns or an allegation is made about another staff member (including supply staff, volunteers and contractors) posing a risk of harm to children this should be raised with the Headmaster without delay and entered onto the CPOMS Staff Safe system.

Should staff have concerns or an allegation is made about DSL, the matter should be reported to the Headmaster and entered onto the CPOMS Staff Safe system.

Where staff feel that there is a conflict of interests in reporting the matter to the Headmaster, they should refer it directly to the LADO.

Should staff have concerns or an allegation is made about the Headmaster, the Chairman of the Board of Governors should be informed, without first notifying the Headmaster. The contact details for the Chairman of the Board of Governors are available from the Secretary to the Board, Mrs Jo Robinson.

Reports of low-level concerns about supply staff and contractors will be notified to their employers so any patterns of inappropriate behaviour can be identified.

Staff are encouraged to be self-reflective and to recognise when they have behaved in a manner that might be misinterpreted or might appear compromising to others and, as such, might fall short of expected professional standards. In these circumstances, they should feel confident enough to self-refer to the Headmaster.

### **Recording Low-Level Concerns**

All low-level concerns will be recorded on the CPOMS Staff Safe system, accessible only to the Headmaster, the HR Manager, and the DSL as appropriate. The individual raising the concern will also be recorded unless they wish to remain anonymous in which case this wish will be respected as far as reasonably possible. Records will be kept

confidentially, securely and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school will address the matter through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, in line with the procedures laid out above and with the involvement of the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies will be revised or extra training delivered to minimise the risk of it happening again.

Records of this nature will be kept for 12 months after the individual leaves the employment of the school.

## **References**

Low-level concerns will not be included in a reference unless they are linked to poor performance or misconduct, or where a low-level concern has progressed to a threshold where it is referred to the LADO and found to be substantiated.

## **Responding to Low-Level Concerns**

The procedures for responding to reports of low-level concerns are laid out in the Staff Code of Conduct.

## Appendix D

### Investigating a Safeguarding Allegation against a Member of Staff (For use by DSL and Headmaster Prior to Investigation)

This form should be used to record details of allegations or complaints made against a member of staff or volunteer.

1. Name and position of member of staff who is subject of allegation/complaint:

.....

2. Is the complaint written or verbal?.....

3. Complaint made by:.....

4. Name of child(ren) involved:.....

5. Date of alleged incident/s:.....

6. Did the child(ren) attend on this/these dates?.....

7. Nature of the complaint (continue on a separate sheet if necessary):.....

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8. Other relevant information:.....

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9. LADOs/Early Years Childcare Team contacted:..... Date:.....

10. Further actions advised by Children's Services/Harms Threshold met?

.....

.....

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.....

**Following the completion of this form, any ensuing investigation will be carried out in accordance with the procedures described in Appendix C of this policy.**

- Do you have details (either a written account or notes from a verbal account) of the alleged incident, signed and dated?
- Have you checked the incident could actually have taken place (i.e. was the child in the lesson; was the member of staff teaching the lesson that day)?
- Is there evidence of significant harm – e.g. a visible injury?
- Has a criminal offence taken place – e.g. has excessive force been used, that could be classed as an assault?
- Has the incident been reported to anyone else – e.g. the Police?
- Were there any witnesses to the incident – if so have you made a note of names?
- Are parents aware of the allegation?
- Is the member of staff aware of the allegation?
- Have you reported the allegation to the LADOs (0121 675 1669) or the Early Years and Childcare Team (0121 303 2605)?

**Remember, do not attempt to investigate the allegation yourself without first seeking advice the LADOs**

Your name and position: .....

Signature:..... Date:.....