



**HOWE GREEN HOUSE**  
BISHOP'S STORTFORD

# **Safeguarding children policy & child protection procedure**

Howe Green House School & Little Oaks Nursery



September 2025 (review September 2026)

**Paul Bailey**

Designated Safeguarding Lead

ISI Reference	7a
Issue Number	8
This policy is endorsed by	Governing Board and the Co-Headteachers
This policy is owned by	Designated Safeguarding Lead and the Co-Headteachers
Review Body	Whole Governing Board

Most Recent Revision Dates	September 2025
Last Reviewed by Governors	September 2025
Period of Review	Annual
Next Review Date	September 2026
Previous Reviews	September 2024, 2023, 2022, 2021, 2020, 2019 November 2018, 2017, 2016

To be made available	YES
To be on website	YES
Internal staff only	NO

Name	Role	Telephone	email
PAUL BAILEY	DSL	01279657706	<a href="mailto:paul.b@howegreenhouse.org">paul.b@howegreenhouse.org</a>
ANNA LIPANI	DEPUTY DSL	01279657706	<a href="mailto:anna.l@howegreenhouse.org">anna.l@howegreenhouse.org</a>
MOLLY BEAR	DEPUTY DSL	01279657706	<a href="mailto:molly.b@howegreenhouse.org">molly.b@howegreenhouse.org</a>
JULIE SELLEARS	DEPUTY DSL (Early Years)	01279657706	<a href="mailto:julie.s@howegreenhouse.org">julie.s@howegreenhouse.org</a>
CLAIRE HUGHES	DEPUTY DSL (Early Years)	01279657706	<a href="mailto:claire.h@howegreenhouse.org">claire.h@howegreenhouse.org</a>
MARIE CALNAN	LEAD SAFEGUARDING GOV	01279657706	<a href="mailto:CALNAN@howegreenhouse.org">CALNAN@howegreenhouse.org</a>
SAM BRISTOW ED FIELDING	CO-CHAIR OF GOVERNORS	01279657706 01279657706	<a href="mailto:BRISTOW@howegreenhouse.org">BRISTOW@howegreenhouse.org</a> <a href="mailto:FIELDING@howegreenhouse.org">FIELDING@howegreenhouse.org</a>

## 1. Who this document applies to:

This document applies to all children under 18 at the setting. It incorporates the requirements in KCSIE 2025, Working Together to Safeguard Children, Prevent and local safeguarding board documentation.

Anyone coming into contact with our pupils or visiting our site must abide by this policy.

Everyone working at the setting as a member of staff or volunteer has a duty to safeguard and protect children. They must read this policy as well as KCSIE 2025 Part 1 and Annex B, and sign to say they understand them and agree to work to them, or complete the Safeguarding Network Knowledge Checker as evidence of understanding.

Visitors to the setting such as contractors must read our safeguarding statement:

### Keeping children safe is our **top concern**.

If on your visit you have any worries at all, please raise them with a member of staff or ask to speak to the Designated Safeguarding Lead or a Co-Headteachers.

- Speak to Paul Bailey, Anna Lipani, Molly Bear, Julie Sellears or Claire Hughes, the Designated Safeguarding Leads, on 01279 657706
- Speak to Paul Bailey or Anna Lipani the Co-Headteachers on 01279 657706

If you are still worried or do not feel able to share your concern with us, you can:

- Contact Essex Safeguarding Children's Board on 0345 603 7627 or Hertfordshire Safeguarding Children on 0300 123 4043

## Table of contents

Who this document applies to.....	3
Roles and Responsibilities.....	4
Who's Who.....	9
Complaints.....	9
Our Aims and Principles.....	10
What to do if you're worried.....	11
Safeguarding in Essex and Herts .....	13
Definitions .....	13
Equality .....	14
Legislation and Guidance .....	15
Teaching about Safeguarding .....	17
Recognising abuse and taking action.....	18
Online safety, Filtering and Monitoring.....	29
Pupils with SEND or health issues.....	31
Pupils with a social worker .....	32
Looked after children .....	32
Pupils who are LGBTQ+ .....	33
How should I respond? .....	33
Information sharing .....	35
Working with parents/carers .....	37
If you are still worried .....	38
Safer recruitment .....	40
Supporting staff .....	46
Concerns about staff .....	47
External providers and visitors.....	49
Record keeping .....	50
Training and development .....	52
Appendix A – definitions of abuse, neglect and specific situations .....	55
Appendix B – Legislation and guidance .....	66

## When we review this policy

This policy is reviewed annually and updated if required. This is so we can keep up to date with safeguarding issues as they emerge and evolve, including lessons learnt and is available on our website. We have incorporated key changes to the government guidance, Keeping Children Safe in Education.

## **2. Role and Responsibility of all staff, volunteers, supply staff and contractors**

All staff will be required to:

- Read and understand Part One and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Howe Green House staff complete a knowledge checker through Safeguarding Network each year to test their understanding. External staff such as sport coaches and peripatetic teachers sign a document to state they have read and understand KCSIE Part One and Annex B and this child protection policy.
- Translated versions of Part One Keeping Children Safe in Education can be found at Keeping Children Safe in Education Part 1 Translations | LGFL. This is accessible for all staff, volunteers, parents and carers whose first language may not be English, should they wish to use this.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our school's safeguarding arrangements and systems are explained to staff as part of their induction and thereafter reviewed with staff at least annually. All new staff/ volunteers are directed to copies of our school's CP policy (on our website [howegreenhouse.org](http://howegreenhouse.org)) and given Part One KCSiE and Annex B, essentially this is the key guidance provided:
- Child Protection Policy
- Staff Code of Conduct
- The role and identity of the Designated Safeguarding Lead (DSL) and deputies
- The Behaviour Policy
- Online Safety Policy
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- KCSiE advises that school staff who work directly with children should read Annex B, this contains important additional information about specific forms of abuse and safeguarding issues. Staff should follow this Child Protection Policy and speak to the DSL (or a deputy)
- It is crucial that all staff look out for children who may benefit from Early Help along with children in Specific Circumstances (Annex B KCSiE 2025), the Early Help assessment process 'Families First Assessment' and their role in it, including identifying emerging problems,



liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to the Local Authority Children's Social Care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

## **Role and Responsibilities of the Designated Safeguarding Lead (DSL)**

- The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary through email at [paul.b@howegreenhouse.org](mailto:paul.b@howegreenhouse.org)
- When the DSL is absent, please contact school's Deputy DSL(s) [anna.l@howegreenhouse.org](mailto:anna.l@howegreenhouse.org), [molly.b@howegreenhouse.org](mailto:molly.b@howegreenhouse.org), [julie.s@howegreenhouse.org](mailto:julie.s@howegreenhouse.org) and [claire.h@howegreenhouse.org](mailto:claire.h@howegreenhouse.org)
- If the school's DSL and deputies are not available or cannot be reached, please directly contact children's services on 0345 6037627 (Essex) or 0300 1234043 (Herts)

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.
- The DSL is also the Prevent Lead

The DSL will also:

- Keep the Co-Headteachers informed of any issues
- Liaise with Local Authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with Police and Local Authority Children's Social Care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a Police investigation or search
- The full responsibilities of the DSL and deputy(s) are set out in their job description. See KCSiE, [Annex C](#)

## **Role and Responsibilities of the Governing Board**

Our Governing board have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

The Governing Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Co-Headteachers to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a lead governor to monitor the effectiveness of this policy in conjunction with the full Governing Board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Ensure that all governors:
  - Read [Keeping Children Safe in Education in its entirety](#), and review compliance of this task at least annually.
  - Sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance (bottom of this policy)

### The Governing Board will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/ activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/ procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

See [Keeping Children safe during community activities, after-school club and tuition: Non statutory guidance for providers running out of school settings](#)

- The Co-Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Co-Headteachers, where appropriate.
- How governors are supported to fulfil their role, can be found in Part two KCSIE 2025.

## **Role and Responsibilities of the Co-Headteachers**

The Co-Headteachers are responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/ carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person (this could be shared between two people)
- Overseeing the safe use of technology, mobile phones and cameras in Early Years setting
- Ensure the School's agreement related to another body providing services or activities on-site has been completed and to be fully satisfied that appropriate safeguarding procedures that adhere to KCSIE 2025 are in place.



### 3. Who's Who

**Paul Bailey** is the Designated Safeguarding Lead. This means they have lead responsibility for the wellbeing and protection of all students at the setting, ensuring staff are recruited and trained safely, and monitoring the progress of any pupil needing additional care or protection.

**Anna Lipani and Molly Bear** are the Deputy Safeguarding Leads, as well as **Julie Sellears and Claire Hughes** in Little Oaks Nursery. They work closely alongside Paul Bailey to be fully aware of the needs of students across the setting and are able to take any necessary action in their absence.

They can be contacted on 01279 657706

**Paul Bailey and Anna Lipani** are the Co-Headteachers and have overall responsibility for the setting, staff and pupils.

They can be contacted on 01279 657706.

## Complaints

### **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

### **Other complaints**

As well as talking to or emailing the staff above, children or parents can make a complaint about something they have seen at the setting. Please see our [Complaints Procedure](#) on our website for more details.

## 4. Aims

**At Howe Green House School and Little Oaks Nursery the school aims to ensure that:**

- › Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- › All staff are aware of their statutory responsibilities with respect to safeguarding
- › Staff are properly trained in recognising and reporting safeguarding issues

## Principles

1. We **always** act in the best interests of each pupil.
2. We **listen** to any communication from pupils, parents or carers and always take concerns seriously.
3. We acknowledge there are **risks** to the pupils in our care. Without proper care and vigilance abuse or neglect of pupils could happen at the setting. We talk about these risks with pupils, staff and parents/carers and together will plan carefully to keep them safe.
4. People **must** act if they are worried about a student and keep acting until they believe the pupil is safe.
5. We are **open** in our decisions and let parents and local authorities know about concerns.
6. We make it easy to raise a concern, and **anyone** raising concerns will be kept safe.

## 5. What to do if you're worried about a pupil at the setting

### parents & visitors

If the child is in **imminent danger**, take action to keep them safe. Tell our staff or if necessary, call the Police on 999 or children's services on 0345 6037627 (Essex) or 0300 1234043 (Herts)



If you are concerned about **staff behaviour** contact **Paul Bailey or Anna Lipani as the Co-Headteachers** on 01279 657706



For other concerns  
**speak to the class teacher**



**We will contact you** by the next school day (sooner if required) to tell you that action has been taken



**If you do not hear**, or you remain concerned, please speak to the Co-Headteacher.

### staff & volunteers

The DSL should be spoken to about any immediate concerns. Record on the CPOMS system which will alert the Designated Safeguarding Lead. Telephone to ensure this has been received



The DSL will assess the level of risk using the Multi-Agency Safeguarding Thresholds Guidance and may contact the Early Help Hub for advice. For Level 1 & 2 needs, talk to the parents, and provide support, including possible referral to other services.



For Level 3 & 4 needs, the DSL will contact parents (unless this would increase the risk) to talk about involving other agencies, as explained in the threshold of needs guide.  
The DSL may contact Children's Services for advice and clarification on level of need.



If we have consent, the DSL will refer to local authority children's social care on 0345 6037627 (Essex) or 0300 1234043 (Herts) If we do not have consent and we have a child protection concern, the DSL **must** still refer.



### **Monitor progress for the pupil.**

Unless it will increase the risk to the child contact the referrer, parent and any staff who need to know to let them know what is happening and what to do.

**All staff, volunteers & visitors have a duty to act to protect children**

If you still have a concern after following these procedures please speak to a Co-Headteachers, Paul Bailey/Anna Lipani or follow our [Whistleblowing Policy](#).

## 6. Safeguarding in Essex and Hertfordshire

We work with both the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP) teams – with the home address of the children being the starting point for which organisation to contact.

Where there is a welfare or child protection concern about a child at the setting we will contact Essex ESCB by phone on **0345 6037627 (Out of hours – 0345 6061212)** or Hertfordshire HSCP on **0300 1234043 (at any time)** this will be followed up by a written referral.

**The FGM mandatory reporting duty (Appendix A, specific issues (h)) is a legal duty requiring teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:**

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

## 7. Definitions

**Safeguarding and promoting the welfare of children** means:

- › Providing help and support to meet the needs of children as soon as problems emerge
- › Protecting children from maltreatment whether that is within or outside the home, including online
- › Preventing impairment of children's mental and physical health or development
- › Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- › Taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

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

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017).



They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The local authority (LA)
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 8. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- › Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language (EAL)
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carers has expressed an intention to remove them from school to be home educated

## 9. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained schools governance guide](#) and [Academy trust governance guide](#). We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation:

- › Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Co-Headteachers should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

**'Safeguarding & promoting welfare'** of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

*Keeping Children Safe in Education*

**'Child protection'** are the systems and processes all agencies follow if there is reasonable cause to suspect a child is suffering, or at risk of suffering, significant harm (s47, Children Act 1989).

## 10. Teaching about safeguarding

We work to facilitate a whole setting approach to safeguarding to listen to and empower pupils to keep themselves safe both on and offline. How we do this varies through the setting depending on the age and understanding of the pupil, worries and issues we come across and the views and values of the families and communities with whom we work.

The school's aim to create 'respectful citizens in a world of possibilities' embodies this vision. Citizenship is about belonging in a community, looking after one another, respecting one another's rights and understanding one's own rights. Pupils are taught formally about the United Nations Convention on the Rights of the Child – their right to an education that helps them fulfil their potential, to protection from violence, abuse or neglect and to express their opinions and be listened to. This can occur in the classroom, or through modelling effective ways to resolve issues between pupils.

Pupils are taught what to do if they are worried about something for themselves or another pupil. They are encouraged to identify safe and important people in their immediate and surrounding family and friends, in the staff team here at the setting and about ChildLine and other organisations that are there to help children & young people in trouble. There are posters and other information about this in the setting.

### Relationships Education

The setting follows the [statutory guidance](#) in teaching about relationships. We talk about healthy relationships, choices, our rights over our bodies, keeping safe and what to do when you are worried – there is more information in our [relationships education policy](#). Where teaching may affect an individual pupil (such as where there has been a significant life event) there will be discussions between the parent, the Designated Safeguarding Lead and the relevant teacher to ensure the teaching is most supportive of the pupil.

## 11. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out here in the event of a safeguarding issue.

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

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

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

Our local procedures for making a referral, are shown on pages 11-13



The following link is to the GOV.UK webpage for reporting child abuse to our local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

### If children raise a concern...

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

We will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- › Put systems in place for pupils to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Always take children seriously, listen carefully and report this to the safeguarding team.

We consider the term 'the child's voice' to represent not only what children say directly, but rather the many ways that children communicate with us, including both verbal and non-verbal communication. The child's lived experience means seeing and understanding their experiences from their point of view, our staff understand that it is very important to always record exactly what a child has said rather than interpret this from an adult/their own perspective. Our staff give careful consideration to knowing that a child may:

- Not feel ready or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

All staff at Howe Green House must ensure that no child is ever made to feel that they are 'any trouble' if they need time and space to share their worries with staff.

The Howe Green House culture of safeguarding endorses the following principles of meaningful engagement with children to include:

#### **Listen**

- Be patient – a child may be finding it hard to find the words to express themselves. Let them tell their story in their own words

- Do not interrogate – you may ‘taint’ evidence by asking leading questions or suggesting what may have happened. Maintain your professional curiosity, ask open-ended prompts.

### **Reassure**

- Reassure the child they are not in trouble and that they have done the right thing in telling you
- Do not tell the child they should have told you sooner
- Reassure the child that it is not their fault – victims can often be blamed by their abusers.
- Do not promise confidentiality – if the child asks you to keep it a secret, explain who you need to tell to keep them safe, if appropriate
- Explain to the child that you will have to share the information and explain what may happen next.

### **Stay Calm**

- Try not to panic, be aware of your own reactions and feelings, avoid showing shock, anger, or disgust
- Do not insult the alleged abuser, however frustrated you may privately feel, children can be very protective of people they care about, even if that person is abusing them.

### **Report**

- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. This can be by hand or scanning the document and recording on CPOMS. Alternatively, if appropriate, make a referral to Children’s Social Care and/or the Police directly. Prioritise this above all other work.
- Inform the DSL of your actions as soon as possible.
- Do not disclose any information to anyone aside from those within your DSL team, unless you are told to do so by a relevant agency involved in the safeguarding process.

## **Concerns that Female Genital Mutilation (FGM) has taken place or a child is at risk of FGM**

Keeping Children Safe in Education (2024) explains that FGM includes ‘all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.’

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting', 'circumcision' or 'initiation'.

**Any teacher** who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her;
- or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth)

Must immediately report this to the Police, personally on 999. This is a mandatory, statutory duty and teachers will face disciplinary sanctions for failing to meet it. In addition, staff should also discuss the concerns with the DSL to report to Children's Services, as appropriate.

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, the teacher must report to the DSL and follow local safeguarding procedures to be taken.

Any other member of staff who discovers that FGM has been carried out on a child under 18 must report this to the DSL immediately to ensure local safeguarding procedures are followed.

If a member of staff who is not a teacher, suspects a child is at risk or suspects that FGM has been carried out, they should report to the DSL and follow local safeguarding procedures.

### **Concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 below illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or a Deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### **Early help assessment**

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be

required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

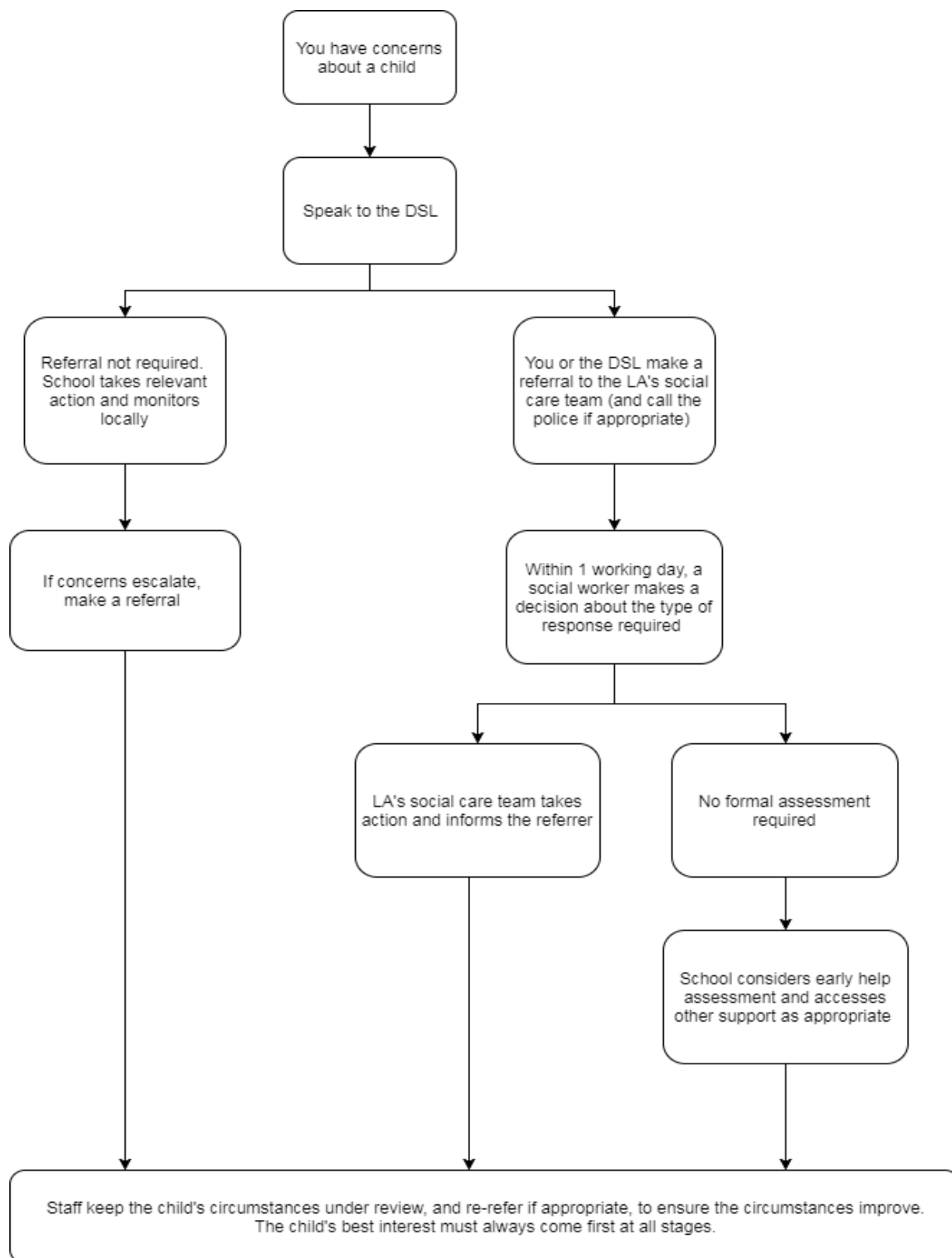
### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.



## Concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local



authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This can include seeking advice from Hertfordshire County Council's Prevent Programme Manager, a referral to Children's Services 0300 123 4043 or [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- › Think someone is in immediate danger
- › Think someone may be planning to travel to join an extremist group
- › See or hear something that may be terrorist-related

## **Concerns about mental health**

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. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If a staff member has a concern about a child's mental health which they consider to also be a safeguarding concern, they must consider if the child is at risk of immediate harm; and if so, should follow steps in in section 8.

If you have a mental health concern about a child that is not also a safeguarding concern, speak to the DSL and Mental Health Lead to agree a course of action.

The Single Point of Access (SPA) Mental Health phoneline is available 24/7 on 0800 6444 101 and can be used when there is an urgent or 'crisis' concern as well as for moderate and non-urgent concerns.

## **Concerns about child-on-child abuse**

At Howe Green House we know that children can abuse other children. No abuse at Howe Green House will ever be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We are committed to upholding a culture that prevents unacceptable

behaviours and an unsafe environment for pupils. All child-on-child abuse is unacceptable and will be taken seriously.

In most circumstances, incidences of pupils hurting other pupils will be dealt with under our School's Behaviour Policy, but this Child Protection Policy will apply to any allegations that raise safeguarding concerns where the alleged behaviour:

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

If a pupil makes an allegation of abuse against another pupil:

- Staff must record the allegation and report to the DSL. Staff should not investigate the matter
- The DSL will assess and if consider the relevant next steps which may include, making a referral to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate
- The DSL will consider whether a risk assessment or a safety and support plan would be beneficial for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond for example off-site activities and school transport
- The DSL will be committed to engaging the child and their parents/ carers to gain their views and contributions and liaise with other agencies to assess any identified risks, unmet needs and relevant measures or support required.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the Police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator.

## **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we expect all staff to:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A child’s friend may report this directly to a staff member or make comments (if they do, staff should be professionally curious)
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation. That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it. That they should speak to the DSL if they have any concerns. That social media is likely to play a role in the fall-out from any

incident or alleged incident, including the potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in managing any proposed risk by the alleged perpetrator(s) and will provide support at the same time, it is not our intention to villainise children, but it is everyone's responsibility to uphold the Behaviour Policy and standards within the school to maintain a safe environment. Such assessments or plans will be robust but sensitive to the individual needs of the children to ensure any identified risk is managed as effectively as possible whilst also supporting them to continue accessing a satisfactory level of education.

Risk management strategies can be put in place while other investigations are going on, e.g. by the Police. Although another agency such as the Police or Children's Services is or has investigated an incident, it is our duty here at Howe Green House to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of our school and the children we care for and the advice and outcomes of those agency's actions. This is to ensure that all children and staff are supported and always protected. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or Children's Services to determine this
- There are circumstances that make it unreasonable or inappropriate for us to reach our own view about what happened while an independent investigation is ongoing.

## Sharing of nudes and semi-nudes ('sexting')

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- › Delete the imagery or ask the pupil to delete it
- › Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- › Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- › Say or do anything to blame or shame any young people involved

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- › The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Co-Headteachers and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

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



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

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

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

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

## **Online safety, monitoring and filtering**

The online world is very present in our pupils' lives and in line with [government guidance](#) we teach about the benefits (and risks) of technology and the internet. This includes how to evaluate what pupils see online, recognising techniques used for persuasion (from advertising to bullying), acceptable and unacceptable online behaviour, identifying online risks and how and when to seek support.

### **12. Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **The 4 key categories of risk**

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

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

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

We will also:

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year
- Educate parents/ carers about online safety via our website, communications sent directly to them and during NSPCC online safety evenings.

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time and when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones, smart watches or cameras.

All pupils are expected to follow the acceptable use of the internet in school and use of the school's ICT systems.

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.

- › Make sure all staff, pupils and parents/ carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation [DfE's guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk from the school's IT systems.

This is achieved through RM and HFL proxy filtering lists applied to internet traffic, this also filters on SSL (Secure Sockets Layer) protocol, so all searches can be inspected, content blocked and alerted on. There are a number of layers to how this works and it enables us to choose content, and, for specific search information, to be alerted - allowing us to investigate and protect children from internet content. In addition, we utilise Senso for monitoring pupils' computers at school. It alerts the DSL and Co-Headteachers for concerns related to online safety, safeguarding and unacceptable behaviours.

We carry out an annual review of our approach to online safety that considers and reflects on the risks faced by our school community

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

Staff in or entering the Early Years classes are not allowed to have their personal mobile devices with them. These should be locked away and stored in the staff room or cupboard in the Reception classroom and only accessed when the children are not present. In addition, smart watches should be removed or switched to aeroplane mode.

### **Artificial intelligence (AI)**

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Howe Green House recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Howe Green House will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

## **13. Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than

their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges
- › Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

Our setting's Behaviour policy provides detail around the '**use of reasonable force**' and how this is only used as a last resort for managing incidents of very challenging behaviour. This is in line with national guidelines and takes in to account individual pupil needs and risk management /care plans and in particular with regard to SEND.

## 14. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- › Responding to unauthorised absence or missing education where there are known safeguarding risks
- › The provision of pastoral and/or academic support

## 15. Looked-after and previously looked-after children

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

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

We have appointed an appropriately trained teacher, Miss Molly Bear (Head of Pastoral and Wellbeing), to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- › Work with other services to promote the educational achievement of looked-after and previously looked-after children

## 16. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL..

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## 17. How should I respond?

### **Parents & children:**

If you have a concern about your pupil or another pupil at the setting, please contact our Designated Safeguarding Lead. We will listen to your concerns, take these seriously and ensure you receive a response. You can contact Paul Bailey, Anna Lipani or Molly Bear on 01279 657706. In Little Oaks you can also contact Julie Sellears or Claire Hughes. If you are still not satisfied you can contact a Co-Headteachers, Paul Bailey or Anna Lipani on 01279 657706, Marie Roberts (Safeguarding Lead Governor), Sam Bristow or Ed Fielding (Co-Chair of Governors), Hertfordshire local children's services

duty team (0300 123 4043), Essex local children's services duty team (0345 603 7627) or if necessary, Ofsted (0300 123 4666).

## Setting staff & volunteers

Every member of staff has a duty to act to keep children safe. Failure to act on a concern could lead to disciplinary action.

Concerns about and/or disclosures by students should be taken to Paul Bailey, Anna Lipani or Molly Bear. In Little Oaks you can also contact Julie Sellears or Claire Hughes. Designated Safeguarding Leads. They will ensure the concern is explored and must let you know what happens as far as is possible.

Concerns about the behaviour of staff must be taken directly to a Co-Headteachers. If the concern is about a Co-Headteachers the Co-Chair of Governors should be contacted, or the Local Authority Designated Officer (LADO).

If you are still concerned after taking a concern to the DSL/Co-Headteachers, you must follow the escalation process until you are not worried anymore. This may include reporting directly to local authority children's social care yourself.

## How do I tell if a young person is at risk of abuse or neglect?

It's difficult to be certain, but if you have a reason to worry then that's enough to talk more with the safeguarding team about the risk or to involve other agencies. Use the definitions of abuse or neglect in this document and the Essex and Hertfordshire threshold of need guides. Some of the key issues affecting our children are set out in [Appendix A](#). More detailed guidance on specific issues is available in the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP) teams' Child Protection Procedures.

Where there are concerns for the wellbeing of a child that do not meet the threshold for abuse or neglect, the setting will use the Early Help Assessment form to record and track such concern.

## 18. Information Sharing

### Confidentiality and Sharing information

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. Howe Green House recognises that timely information sharing is essential for effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Staff should never promise a child that they will not tell anyone about a safeguarding disclosure, as this may not be in the child's best interests.

The following principles apply to Howe Green House confidentiality agreement:

- . Timely information sharing is essential to effective safeguarding.
- . The Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- . If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- . Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- . If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - Even if a victim doesn't consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies.
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
  - The DSL should consider the following points:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk).
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Local Authority Children's Social Care where the child resides.
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

We follow the 7 Golden Rules from [Information sharing advice for practitioners](#):

1. The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. We will be open and honest with individuals (and/or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. We will seek advice from other practitioners (e.g. MASH), or our information governance lead, if in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. We share information with informed consent where appropriate and, if possible, respect the wishes of those who do not consent to share confidential information. We still share information without consent if, in our judgement, there is a lawful basis to do so, e.g. where safety may be at risk. We base judgements on the facts of the case. We are clear why we share or request personal information from someone. We remain mindful that individuals might not expect information to be shared, even with consent.
5. We consider safety and well-being and base our information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: We ensure information we share is necessary for the purpose for which we are sharing it, is shared only with individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. We keep records of our decision to share (or not to share) and the reasons for it. We record what we have shared, with whom and for what purpose.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).



Legally, we must share information within the setting on a 'need to know basis', so that everyone who needs to know information to keep children safe and help them develop does know.

When we are worried about a child it is essential we record the concern and inform the designated safeguarding lead promptly.

Some information within the setting will be further restricted, for example:

- Where there is an allegation about a member of staff the Co-Headteachers will decide who will lead on the concern and contact other agencies.
- Where the detail of information is particularly sensitive this can be restricted further, for example the details of sexual abuse or a young person sharing worries about their mental health or sexuality. Staff involved in their direct care may need to know in general terms the nature of the concern.

## 19. Working with parents and carers

At Howe Green House where appropriate, we will discuss concerns about a child with their parents or carers. We know parents and carers know their child best and we will always value that often, when concerns emerge, these can easily be resolved with the support of school and parents/ carers working together. To retain confidentiality within the school community other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

Although we will always want to be open and transparent with our parents and carers, there may be circumstances where the safety of a child overrides their liberty and rights for this to happen immediately as consent may not be appropriate/ required. For a small number of children, seeking parental consent would not be appropriate if:

- The child would be placed at increased risk of significant harm through the action of gaining this consent
- There would be an impact on a criminal investigation
- A delay in making the referral would impact on the immediate safety of the child.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Local Authority Children's Social Care team to seek advice when it would be the right time to share information, so that we do not interrupt planned inquiries by Children's Services or the Police.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about other children involved, and when. We will work with the Police and/or Local Authority Children's Social Care to make sure our approach to information sharing is consistent.

The DSL will, along with other agencies if there is third party involvement (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) for any decision(s).

## 20. What to do if you are still worried...

The setting has an internal escalation process, and links with the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP) teams' Child Protection Procedures professional conflict resolution policy.

**Anyone worried about a child must continue to raise the concern until they have a reason not to be worried about the child anymore.**



Every member of staff must follow this process. There will be no reprisals for honestly raising a concern. Where an immediate decision is needed, and a particular person is unavailable you may move to the next stage. The timescale for the process relates to the urgency of the decision, but in any event should not extend beyond one week.

We **always** listen to concerns raised by children, families, staff, visitors, or other organisations. The whistleblowing process should only be used if there are no clear safeguarding procedures, you are concerned your concern won't be dealt with properly or will be covered up, your concern has not been acted upon or you are worried about being treated unfairly. The prescribed organisation for safeguarding children whistleblowing is the NSPCC: **0800 028 0285** or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 21. Safer Recruitment

We do our best to ensure we employ 'safe staff' by following the guidance given by the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP) teams' [Child Protection Procedure on Safer Recruitment](#) and our individual procedures. Those involved in recruitment and employment of staff have received safer recruitment training in line with DfE guidance, [Keeping Children Safe in Education](#).

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information

- Sign a declaration confirming the information they have provided is true

## **Shortlisting**

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

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

We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

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

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview. If references are delayed, any issues identified at a later stage will be followed up with the candidate.

When seeking references we will:

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

## **Interview and selection**

When interviewing candidates, we will:

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

## Pre-appointment vetting checks

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

### New staff

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

- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- › Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Ensure they are not subject to a prohibition order if they are employed to be a teacher
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- › Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, Headteachers, principals and deputy/assistant Headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

### **Existing staff**

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

- › There are concerns about an existing member of staff's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more
- › Staff also make a declaration annually confirming they are not are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006

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

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

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

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

## **Contractors**

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

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

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

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **Volunteers**

We will:

- › Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- › Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- › Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- › Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such



checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **Governors**

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

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

The chair of the board will have their DBS check countersigned by the secretary of state.

All governors will also have the following checks:

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

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

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

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

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

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

## **New Staff**

- Familiarisation with our safeguarding policies and procedures and support to identify child protection training needs
- The roles and identities of the DSL & Deputies and how to refer concerns to them (and / or directly to the relevant agencies if required)
- Reading and agreeing to abide by KCSIE part one and Annex B
- Pupil behaviour policy & Antibullying Policy
- CME (Children Missing in Education) response protocol
- Online safety information - expectations on staff conduct / acceptable use of IT and communications and social media – including staff / pupil relationships
- Staff code of conduct – including whistleblowing policy

All staff will complete a knowledge checker through the Safeguarding Network which will confirm that they have read and **understood** the safeguarding policies and procedures and they will attend all necessary and relevant training.

## 22. Supporting staff at the setting

### **Code of conduct**

We have published a code of conduct which sets out expectations of staff around appropriate boundaries and staff keeping themselves safe – staff sign to say they have read and understood this document.

### **Emotional support**

Having to deal with a situation where a young person has experienced harm can be stressful and upsetting. We will support staff in a variety of ways, including a debrief with their line manager and/or the Designated Safeguarding Lead as appropriate. Where necessary confidential counselling services and additional resources will be sought. The school provides staff members with access to the 'Health Assured' employee assistance programme.

### **Supervision**

Staff involved in working within child protection and safeguarding, either directly with children, or supervising staff who do, will receive regular supervision. This supervision will be half-termly and will provide a space for the staff member to

- reflect on any safeguarding issues that the staff member has been involved in (directly or indirectly) and allow for agreement on any further action required;
- talk about issues which they are facing in the work environment, including thoughts that they have in terms of developing the service that is provided to the children; and
- discuss the emotional impact of the role as well as any other issues that they consider relevant.

## 23. Concerns and allegations about staff

Staff should take care not to place themselves in a vulnerable position with a child. While staff are friendly with children, they do not become friends. No staff member will share their personal details with children, have on-going contact or relationships with children outside of the setting (including social networking) and accept or give significant gifts. Staff must adhere to the risk assessment for lone working policy. Any member of staff who is unsure should seek advice from their line manager. All staff understand that a young person may make an allegation against a member of staff. Any such concern will be reported directly to a Co-Headteachers, unless it is about a Co-Headteachers, in which case it will be reported directly to a Co-Chair of the Governing Board.

Members of staff must advise a Co-Headteachers **immediately** if it is alleged current staff (including volunteers) may have:

- 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 would pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If the allegation concerns a Co-Headteachers staff will immediately inform a Co-Chair of Governors without notifying the Co-Headteachers first. The Co-Headteachers (or a designate) will follow the [Managing Allegations & Safeguarding Concerns policy](#) and where appropriate discuss the content of the allegation with Hertfordshire's or Essex's LADO (designated officer for the management and oversight of allegations) and follow their procedures for managing allegations and safeguarding concerns about staff. We will [make a barring referral to the DBS](#) should an allegation made against a member of staff be upheld. Allegations about prior members of staff or historic allegations will be referred to the police.

### Low level concerns

Staff, including volunteers and agency staff, will report to a Co-Headteachers any concern about other adults working with children, no matter how small they seem. The term low level concern does not mean it is insignificant, it means that the behaviour towards a child does not meet the allegations threshold of harm or is not serious enough to consider a referral to the LADO. It could amount to inappropriate behaviour such as being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis behind a closed door or secluded area or using sexualised, intimidating or offensive language. Staff are clear about what appropriate behaviour looks like and are trained to help to identify any weakness in the setting's safeguarding system.

A Co-Headteachers will consider whether a low-level concern is in fact an allegation. If there is doubt the LADO should be advised **immediately**.

### Whistleblowing

We promote good practice and professional conduct through the organisation. Staff must be committed to providing a high standard of service and understand that children cannot be

expected to raise concerns in an environment where staff fail to do so. All staff are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff will follow our [whistle-blowing policy](#). As necessary, they should speak to the Designated Safeguarding Lead, Senior Leadership Team or the Hertfordshire or Essex local authority designated officer.

If a member of staff notices anything that gives them cause for concern it is vital that this is raised. Acting upon staff concerns is fundamental in order to ensure good practice and support for staff. Resolving issues must be viewed by all staff as a positive action and not a breach of trust between colleagues or an attack on the organisation. We value an atmosphere of openness and honesty and welcome suggestions, complaints and criticisms. Whistleblowing includes raising and passing on concerns about any of the following:

- a) Poor standards of service
- b) Issues of bad practice
- c) The conduct of colleagues or managers
- d) Anything which is not in the best interest of the young person or the organisation
- e) Anything which is illegal or unacceptable behaviour.

If you think that your concern won't be dealt with properly or will be covered up, your concern has not been acted upon or you are worried about being treated unfairly, then the prescribed organisation for safeguarding children whistleblowing is the NSPCC: **0800 028 0285** or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 24. Keeping children safe during community activities, after-school clubs, private hire and tuition

As a provider Howe Green House have a legal duty of care to try to ensure our environment is safe for children who visit in addition to those who already attend our setting.

We may receive an allegation or concern relating to an incident that happened when an individual or organisation were using our school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, Howe Green House will follow our safeguarding policies and procedures, including informing the LADO where appropriate.

The Governing Board will ensure any organisation that hires the school premises is compliant with guidance set out in [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings). They will [therefore seek assurance that the provider concerned has the appropriate safeguarding and child protection policies and procedures in place \(including inspecting these as needed\)](https://www.gov.uk/government/publications/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings) and will ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these activities are children on the school roll or not.

### Visitors and Visiting Staff

Visitors must report to the Reception Office located in the Bayford Hall immediately upon arrival. They will be asked to sign the visitors book and be issued with a visitors pass. This includes visiting staff - for example sports coaches or peripatetic music teachers. If a visiting staff member has been DBS checked, they will receive a green lanyard and badge. If a person has not been DBS checked, they will receive a red lanyard and badge and will be accompanied around school, unless stated otherwise following a risk assessment (for example Year 6 children taking prospective parents on a tour of the school). Any person, (other than an employee, parent or pupil) on the school site and not wearing a visitors pass will be challenged and, if necessary, asked to leave.

Visitors and visiting staff must sign out before leaving the premises.

## 25. Record Keeping

Howe Green House will hold records confidentially, safely, securely and in line with our records retention schedule.

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

Records will include:

- A clear and 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.

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/ access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25<sup>th</sup> birthday or 31<sup>st</sup> birthday if there is an EHCP in place (Information Records Management Society 2022). [IRMS Schools Toolkit - Information and Records Management Society](#)

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

*Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.*

The school will follow the recommendation 17.

### **Receiving** in and transferring pupil records to other education provision

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/ college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

### **Retention, archiving and destruction of records**

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- A clear retention policy
- Secure and appropriate system to archive with restricted access
- We have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

## 26. Safeguarding Training and Development

To fulfil our aim of continuous improvement in order to safeguard our pupils, we ensure that learning and development starts at induction. All staff, including leadership and management, and Governing Board, undertake the minimum safeguarding training. We want reassurance for our children and families that all staff are aware of systems within our school, and have the skills and knowledge to follow our schools procedures.

### Induction

- Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct - including low-level concerns, allegations against staff and whistleblowing
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- Role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
- Copies of/ given links to Part One KCSiE and Annex B

### Safeguarding children training for all staff and senior leadership

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with the quality and standards expected from our safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards (and TA regulations) and code of conduct to support the expectation that all teachers and those that work with children in regulated activity can confidently:
  - Manage our pupils' behaviour effectively to ensure a positive and safe environment
  - Have a clear understanding of the needs of all pupils, especially pupils with protected characters and those that are on any type of plan to support their needs.

In addition, all staff will have training that raises awareness of children susceptible to harm such as radicalisation which our school adopts the government's anti-radicalisation strategy, and Prevent duty to enable us to identify children at risk of being drawn into terrorism and to challenge extremist ideas.



## New staff

The appointment letter to new staff will contain links to Part 1 and Annex B of the current [Keeping Children Safe in Education](#) with a requirement this is read and understood before they start work. During their first week at work the **designated safeguarding lead** will:

- talk with them about Keeping Children Safe in Education with opportunity for questions,
- introduce them to the setting's Safeguarding and Child Protection Policy and pathways for raising concern and
- ensure they know what to do if worried about a child.

## Agency staff

**Agency staff** working at the setting for a month or more will be required to meet the same standards as permanent staff.

**Agency staff** working for less than one month must read Part 1 and Annex B (as appropriate) of the current [Keeping Children Safe in Education](#). Their agency must provide written assurance the member of staff has safeguarding children training to the appropriate level for the role in the relevant time period.

## Our school's current safeguarding training schedule is as follows:

All staff, including DSL/deputies and whole school staff must attend safeguarding children training every year

- Our school's DSL provides an annual update to all staff, which includes online safety
- Throughout a given academic year, our school's DSL provides for all staff relevant **updates** as changes occur to keep abreast of our whole school approach and thus supporting staff to fulfil their role as set out in Part One of KCSiE (for example, through **emails** and **staff meetings**).
- **Contractors** will also receive safeguarding training and understand who to contact should they have concerns, and if not undertaken at our school we will ensure through their employer that they have the skills and knowledge to blend in with our school's policies and procedures.
- We value our school's **volunteer's** cohort; they play a very important part in our school to work alongside staff to support and protect our pupils. We anticipate that all volunteers share our whole school approach and are willing to receive appropriate training and support from our staff.

## DSL and Deputy(s)

- The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. The DSL and their deputies receive regular DSL training and refresher courses every 2 years, including 2 yearly inter-agency working training. As the school works with children who live in both Hertfordshire and Essex, the DSL's alternate their LSCB training between these authorities to ensure both LSCB protocols are understood.

- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments)
- They will also undertake Prevent awareness
- It is desired that our DSL and deputies when capacity permits, undertakes multi-agency training, this provides opportunities to develop further their knowledge and skills to work with a wide range of safeguarding themes that our children and families can be affected by locally.

## Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding
- As a Co-Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Co-Headteachers, they receive training in **Managing Concerns and Allegations** for this purpose.

## Co-Headteachers

As the Co-Headteachers are ultimately responsible for safeguarding children from adults who work or volunteer with children and are either unsuitable or pose a risk to children, therefore it is highly recommended that **Managing Concerns and Allegations** training is undertaken in order to maintain an ongoing vigilance of safe practice and culture within the school.

## Appendix A – definitions of abuse, neglect and specific situations

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

- › Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- › Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- › Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyber-bullying), causing children frequently to feel

frightened or in danger, or the exploitation or corruption of children

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

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

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

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- › Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- › Protect a child from physical and emotional harm or danger

- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Specific issues

Staff must respond if they identify any of the following:

### a) **Domestic Violence and Abuse**

We recognise that Domestic Abuse has a significant impact on a child's development and emotional wellbeing and should always lead to a child protection referral. Domestic abuse is very widespread and where staff have concerns for other staff members they should talk to their supervisor. The Domestic Abuse Act 2021 recognises children as victims in their own right if they see, hear or experience the effects of abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships. All of which can have a detrimental and long term impact on their health, wellbeing, development, and ability to learn.

We work with the Essex and Hertfordshire Police Services.

The setting will talk to parents, children and other agencies about such issues where required.

### b) **Physical Intervention and restraint**

Staff must read the behaviour policy and code of conduct and understand how to work with children in a person-centred way and learn to analyse the child's behaviour and respond in a proactive and caring way to reduce the stress displayed.

Our procedure on physical intervention and restraint is set out separately and acknowledges that staff must only ever use

physical restraint as a last resort when a pupil is endangering themselves or others, and that at all times it must be the minimum force necessary to prevent injury and applied for the shortest possible time.

All staff understand that physical intervention or restraint of a nature which causes injury or distress to a pupil and is unreasonable under the circumstances may be considered a disciplinary matter.

Where there is a predictable need for staff to intervene physically, i.e. should a child have a condition that increases the likelihood of inappropriate physical behaviours, specific 'positive handling' training will be given to staff.

### c) **Bullying**

Bullying between children is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a pupil's wellbeing and in very rare cases has been a feature in the suicide of some children.

All incidences of bullying including cyber bullying and prejudice-based and discriminatory bullying should be reported and will be managed through our [Anti-Bullying Policy](#) and in some circumstances could lead to a child protection referral. Staff will work with individual children who have been bullied and those who have bullied others to assist them to understand their actions. If the bullying is particularly serious or if the procedures taken are ineffective the Safeguarding Team will consider implementing child protection procedures.

Staff allowing or condoning bullying may face disciplinary proceedings. This includes cyber, racist, homophobic & gender related bullying. (See also: e) child on child/child on child abuse)

### d) **Child on child sexual violence and sexual harassment and other harmful sexual behaviour.**

This is a form of child-on-child abuse. Children may be sexually harmed by other children inside or outside of education settings and online. The setting has a zero-tolerance approach to sexual violence & sexual harassment and all reports will be taken seriously.

Staff have been trained to recognise abusive behaviours, grading these using a recognised framework. Where there is concern a young person may have been sexually abused by another young person the local authority and parents will be contacted and we will plan together how best to respond.

We regularly review our actions and decisions with locally agreed multi-safeguarding arrangements put in place by the safeguarding partners to ensure that our learners feel confident to make reports and disclosures to the setting. We provide support to both alleged victims and perpetrators.

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence and may constitute sexual harassment. We recognise sexual violence (rape, penetration and sexual assault) and sexual harassment (unwanted conduct of a sexual nature) are crimes and will always follow the DfE [guidance](#) when allegations are received.

#### e) **Child on child abuse**

This covers any kind of physical abuse (such as hitting, kicking, shaking, biting and hair pulling), sexual abuse (such as rape, assault by penetration and sexual assault, making someone strip or engage in sexual activity with another), emotional or financial abuse or coercive control exercised between children.

It may occur within or out of education settings and can sometimes be linked to [gang involvement](#). It includes bullying, prejudice-based bullying, discriminatory bullying, cyberbullying, [consensual and non-consensual sharing of nude and semi-nude images and/or videos](#), abuse in intimate personal relationships between peers, [sexual violence, harassment](#) (sexual comments, remarks, jokes and online sexual harassment which can be standalone or part of a broader pattern of abuse).

A whole setting preventative approach is taken to enable pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express views and feedback. Even if there are no reported cases of child-on-child abuse, this setting is aware that such abuse may still be taking place but is not being reported. We will continue to work with our learners to make our procedures more accessible. It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim. Behaviour may be intimate or non-intimate.

Although both the perpetrator and victim of child on child abuse are under 18, understanding the power dynamic between children and young people is very important in helping to identify and respond to child on child abuse – there will be a power imbalance and this may be due to age or status – social or economic – and the perpetrator in one situation may be the powerless victim in another so it is essential to try to understand the perpetrator and what is driving their behaviour before taking sanctions. We will also deal supportively and effectively with reports/disclosures that turn out to be unsubstantiated, unfounded, false or malicious.

A thorough investigation of the concerns should take place to include any wider contexts

which may be known. However, the victim should always be made to feel safe, and actions will need to be taken to separate victim and perpetrator and ensure that the abuse is not allowed to continue. Staff will remain vigilant and will not downplay the scale or scope of abuse. The issues of the interplay between power, choice and consent should be explored with children. How a setting responds is seen to influence the confidence of others to report what is happening to them. Harmful sexual behaviour must be addressed to help prevent problematic, abusive and/or violent behaviour in the future. How a setting responds to a disclosure or incident will impact future victims of sexual violence or sexual harassment. Pupils may not directly inform staff about their abuse. It may be that staff overhear a conversation or changes in the pupil's behaviour indicate abuse or harm. Sexual assault can result in a range of health needs so the safeguarding team will signpost to sources of support.

All staff are trained to respond to all child on child – or sexual harassment allegations, by referring to the DSL immediately.

#### **f) Racist and other Hate Incidents**

We value each member of the setting's community as an individual. We are therefore committed to equality of opportunity for all staff, students and visitors, and to meeting the requirements of the [Equality Act 2010](#). Equality does not mean treating everyone the same; it means treating people fairly, with respect, having regard for their rights and wishes. Sometimes, this might mean giving people extra help so that they have the same chances. We follow our Equality policy and acknowledge repeated racist, disablist, homophobic, transphobic or other hate incidents or a single serious incident may lead to consideration as a

disciplinary matter and under Child Protection procedures. All hate incidents, including for example jokes, name-calling or excluding someone on the basis of race, disability, religion, sexual orientation, gender fluidity etc. will be taken seriously and must be reported to the Co-Headteachers.

#### **g) Forced Marriages & 'Honour' Based Abuse**

Forced marriage is when a person faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if you're made to feel like you're bringing shame on your family).

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

If staff become aware of either possibility it must be reported immediately to the Safeguarding Team or the Police.

#### **h) Female Genital Mutilation**

Female Genital Mutilation is a form of violence against women and young girls and considered as child abuse in the UK wherever it has occurred. It is a grave violation of the human rights of girls and women to life and their right to mental and physical health. The UK Government has signed international human rights laws against FGM, including the Convention on the Rights of the Child, and enacted the FGM Act 2003 which includes [mandatory reporting](#) by teachers who become aware that this may be planned or has happened for any child (U18). Access e-learning on FGM [here](#). Further advice on local services is [available here](#).



### i) **Child Criminal Exploitation (CCE)**

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

It can include being threatened, forced or manipulated into:

- Child sexual exploitation
- Working in cannabis factories
- Shoplifting
- Pickpocketing
- Vehicle crime
- County lines
- Modern slavery
- Serious violence

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation. More information is available [here](#).

### j) **Criminality, anti-social or gang related behaviour**

Education settings often identify children involved in these kinds of behaviours. We will be particularly aware of the risks of our more vulnerable children being drawn into challenges and difficulties and respond with sensitivity rather than judgement.

We recognise the particular issues in our local community and respond with awareness and sensitivity to the pressures on children, while holding firm boundaries around the setting to ensure it is a safe place for our pupils. We achieve this through the promotion of equality

and choice throughout the curriculum and setting values. We also build relationships with pupils, understand who they admire and relate to, and create an environment where it is safe to talk about even the most difficult of things.

Where we become aware of the [signs of gang activity](#) we will talk with the pupil and their family, link with preventative services in our area and where necessary [involve the Police](#).

### k) **Serious violence & Knife Crime**

Knife crime occurs very rarely in our local community. The PSHE curriculum and the relationships pupils have with staff create an environment where the raising of concerns in this area can occur openly and with confidence. The setting will report the carrying of knives, but more importantly will explore with pupils who are concerned safe ways to manage their fears and enable them to build safe relationships with adults so they can talk to us when worried about themselves, their family, their friends or others in the community.

### l) **Children at court**

Where courts are involved in children's lives the setting will take additional steps to support them and their family. This includes facilitating access to an age appropriate [guide for young witnesses](#), or supporting families going through separation with [help on child arrangements](#).

### m) **Family in prison**

We recognise the additional risks for pupils with family members in prison. The setting will adapt to support the different arrangements required and take action to support the pupil in the setting following the guidance of the [National Information Centre on Children of Offenders](#).

### n) **Homelessness & Poverty**



Children's life chances are dependent upon a complex combination of household income, equality of opportunities and social inclusion/exclusion. While some children who grow up in low-income households will go on to achieve their full potential, many others will not. Poverty places strains on family life and excludes children from the everyday activities of their peers.

Coupled with poverty the setting has a heightened awareness of homelessness. The definition of homelessness means not having a home of your own. You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head.

Poverty and homelessness may have an impact in terms of tiredness, appearance, mental and physical health, stress, anxiety, attainment, self-esteem and vulnerability to the other safeguarding issues identified.

Howe Green House will pay particular attention to any children impacted by poverty or homelessness, providing support for engagement wherever possible and talking to parents about their worries. Where these issues are causing the pupil significant harm, the child protection process is followed.

#### **o) Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and / or coercion of children under the age of 18 into penetrative or nonpenetrative sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The victims can be male or female. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, or making them look at sexual images or watch sexual activities, encouraging children to

behave in sexually inappropriate ways or grooming a child over the internet, as a one-off occurrence or over a long period of time, before the abuse begins. It may also happen without the child's immediate knowledge by for example, others sharing videos or images of them on social media. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. While children may believe they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited. CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All staff must be aware of the indicators of sexual exploitation and all concerns reported immediately to the Safeguarding Team. Further advice on local services is available here: the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP).

#### **p) Substance misuse**

The setting takes a serious view of substance misuse while recognising that children may get caught up in misusing substances through vulnerability or exploitation.

All cases of substance misuse should be brought to the attention of the Co-Headteachers and Designated Safeguarding Lead who will consider both the student behaviour policy and any factors that may indicate a young person is in need of help or protection.

#### **q) County Lines**

County lines are a network between an urban centre and county location where drugs are sold often over a mobile phone. Children and vulnerable people are used to transport drugs,

cash or even weapons. It can involve intimidation, blackmail and serious violence.

We recognise the potential for these issues and are particularly aware of the risks to children who are, or previously have, been subject to safeguarding concerns, where there are unstable home conditions, social isolation, significant money issues or homelessness, gang activity or where children have been excluded from education.

We will be vigilant for the for the [signs of exploitation](#) and take prompt action to involve [the Police](#) and Children's Services where concerned.

#### r) **Trafficking**

The two most common terms for the illegal movement of people – 'trafficking' and 'smuggling', are very different. In human smuggling, immigrants and asylum seekers pay people to help them enter a country illegally; after which there is no longer a relationship. Trafficked victims are coerced or deceived by the person arranging their relocation. On arrival at their destination the trafficked child or person is denied their human rights and is forced into exploitation by the trafficker or person into whose control they are delivered.

- Children are a special case: any child transported between or within countries or cities/towns for exploitative reasons is considered to be a trafficking victim, whether or not they have been deceived. This is partly because it is not considered possible for children to give informed consent under these circumstances.
- Even when a child understands what has happened, they may still appear to submit willingly. Any concerns about trafficking and exploitation must be reported to the Safeguarding Team immediately.

#### s) **Radicalisation and Extremism**

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 members of our armed forces, whether in this country or overseas.*

Extremism includes, for example, far right views, animal rights activism and religious fundamentalism.

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.

Children 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 our staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- **Identity Crisis** – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- **Personal Crisis** – the child 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 young person'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 child 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 or disability** – children 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 children 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; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## Preventing Radicalisation

In order to reduce the risks of children being radicalised we have:

- Ensured the Designated Safeguarding lead, deputies and a substantial portion of the staff group completed Prevent training;
- maintained and applied a good understanding of the relevant guidance in relation to preventing children from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- raised awareness about our role and responsibilities in relation to protecting children from radicalisation and involvement in terrorism;
- raised awareness about the safeguarding processes relating to protecting children from radicalisation and involvement in terrorism;
- identified the Designated Safeguarding Lead as the first point of contact for case discussions relating to children who may be at risk of radicalisation or involved in terrorism;
- collated relevant information from referrals of vulnerable children into the Channel process (where applicable);
- ensured the Designated Safeguarding Lead (or designate) could attend Channel meetings as necessary and carry out any actions as agreed;
- ensured that progress on actions would be reported to the Channel Co-ordinator; and
- shared any relevant additional information in a timely manner.

**Further advice and local services can be found here:** the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP) teams

### t) **Online or internet use**

For many adults, there is a separation in their minds between 'real life' and the 'online world'.

The connected world embraces both online and offline and is the norm for most children, having grown up with the use of mobiles phones, tablets and computers on a daily basis. While mobile devices are a source of fun, entertainment, communication and education we know that some adults and children will use these technologies to harm children. Our policy states they may not be used in school time. The harm might range from hurtful and abusive texts and e-mails, to enticing children to engage in sexually harmful conversations, webcam photography or face-face meetings. In many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online via abusive, harassing, and or misogynistic messages, the non-consensual sharing of indecent/sexual images, especially around chat groups and the sharing of abusive images and pornography to those who do not wish to receive such content. Our online safety policy explains how we try to keep children safe in the home. The setting follows [UK Council for Internet Safety and Department for Education Guidance](#) around 'sharing nudes and semi-nudes' – staff will immediately report concerns to the Designated Safeguarding Lead.

Social networking sites are the more obvious sources of inappropriate and harmful behaviour and children cannot access these on our IT system. We will work with children on how to maintain their own safety and how to summon help if they are concerned about what they see online. Some children will undoubtedly be chatting on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their children safe.

The staff Code of Conduct provides further advice and guidance regarding the use of social networking and electronic communication with children in our care. In our setting, online safety

is considered whilst planning the curriculum, any teacher training, when planning the role and responsibilities of the designated safeguarding lead and any parental engagement.

[Further information can be found in our setting's online-safety policy.](#)

#### u) **Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. We know some people abuse children through taking or using images, so we must ensure that the following safeguards are in place.

While parents are permitted to bring in a camera to events, no staff member should use their personal equipment to take photographs of children. The setting provides equipment for this purpose.

Where a staff member has concerns someone is taking photographs in breach of this policy, they should contact the Co-Headteachers.

To protect children we need to:

- a) seek parental consent for photographs to be taken or published (for example, on our website or in the newspapers or other publications).
- b) ensure that the child is appropriately dressed.
- c) encourage children to tell us if they are worried about any photographs that are taken of them.

Consensual sharing of indecent and/or sexual images between children may require a different response. It might not be abusive but children need to know it is illegal, whilst non-consensual is illegal and abusive. Staff should be aware that many indecent images in current circulation were taken by the child themselves or peers. Sex, sexuality and relationships should be an age-appropriate topic in the home and include what

to do if children are worried about an image they see.

#### v) **Private Fostering**

Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is to be looked after for a period of 28 days or more by someone who is not a close relative, guardian or person with parental responsibility. Close relatives include parents, step-parents, aunts, uncles, brothers, sisters and grandparents.

By law, [the local authority](#) must be told about all private fostering situations. The child's parents, private foster carer and anyone else (including the setting) involved in/aware of the arrangement are legally required to inform the local authority.

It is then the local authority's legal duty to make sure all private fostering arrangements are safe for the child or young person. Once informed of the arrangement the local authority will check the suitability of private foster carers, make regular visits to the child or young person and ensure advice, help and support is available when needed.

#### w) **Body Image and confidence**

Children come under increasing pressure to conform to so-called ideals by peers, adults, sometimes parents, the mass media, [through social media](#) and through their own view of themselves. [Research](#) shows more than half of children worry about the way they look, and this can lead to withdrawal, isolation, emotional and at its extremes serious physical harm. We work assertively to tackle these values, support individuality and teach body confidence at the setting and encourage children to work together to present a positive and healthy view of body shape.

#### x) **Young carers**

A young carer is someone aged 18 or under who helps look after a relative who has a condition, such as a disability, illness, mental health condition, or a drug or alcohol problem.

Most young carers look after one of their parents and/or care for siblings. They do extra jobs in and around the home, such as cooking, cleaning, helping with medication or helping someone to get dressed and move around. Some children give a lot of physical help to a parent or sibling who is disabled or ill. Along with doing things to help, they may also be giving emotional support to family members.

Children and young people are not supposed to undertake inappropriate or excessive caring roles that may have an impact on their development. The [Care and Support Statutory Guidance 2016](#) (First contact & identifying needs, s6.68-6.73) lists some duties which would be considered inappropriate, but you should also consider the impact of the following caring responsibilities on children:

- personal care such as bathing and toileting
- strenuous physical activity such as lifting
- administering medication
- maintaining the family budget
- emotional support to the adult

#### y) **Children going missing**

All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff are aware of the setting's unauthorised absence and children absent from education procedures.

#### z) **Modern slavery**



Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they are deceived and coerced into, and feel they cannot leave. It can include:

- human trafficking
- sexual exploitation
- criminal exploitation
- forced labour
- domestic servitude

We work within the remit of the local [Modern Slavery procedures](#). Concerns will be referred to the [Essex Safeguarding Children Board](#) (ESCB) and the [Hertfordshire Safeguarding Children Partnership](#) (HSCP) teams or [the police](#) for them to then follow the [National Referral Mechanism](#).

**aa) Children who have previously had a social worker**

Children who have previously been 'looked after' by a local authority or had a social worker may require additional support. This includes children who have returned home from care, who have been adopted, or who are care leavers.

The setting will assess the need for additional support to all children who have previously had a social worker.

**bb) Children who are absent from education**

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

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

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

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

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

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

## Appendix B - Links to relevant legislation and guidance

[Working together to safeguard children](#): A guide to inter-agency working to safeguard and promote the welfare of children DfE 2018 (updated December 2020)

[Misuse of Drugs Act 1971](#)

[Keeping Children Safe in Education](#), DfE 2025

[Teaching online safety in school](#): Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects, DfE June 2019

[SEND Code of Practice](#): 0 to 25 years Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities DfE, 2015 (updated April 2020)

[Children missing education](#): Statutory guidance for local authorities, DfE 2016

[Framework for the Assessment of Children in Need and their Families](#) 2000 (archived 2013)

[What to do if you're worried a child is being abused](#): Advice for practitioners, DfE, 2015

[The Equality Act 2010](#): guidance. Information and guidance on the Equality Act 2010, including age discrimination and public sector Equality Duty

[Safeguarding children who may have been trafficked: practice guidance](#), HMG, 2011

[Revised Prevent duty guidance: for England and Wales](#), HO 2021

[Protecting children from radicalisation: the prevent duty](#), DfE 2015 [Children Act 1989](#)

[Human Rights Act 1998](#)

[UN Convention on the Rights of the Child](#)

[Data Protection Act 2018](#)

[Data protection: toolkit for schools](#), DfE 2018

[Guide to the UK General Data Protection Regulation \(UK GDPR\)](#), ICO

[Sexual Offences Act 2003](#)

[Children Act 2004](#)

[Education Act 2002](#)

[Protection of Freedom Act 2012](#)

[Counter-Terrorism and Security Act 2015](#)

[Female Genital Mutilation Act 2003](#)

[Serious Crime Act 2015](#)

[Mandatory reporting of female genital mutilation: procedural information](#), HO 2016

[The Anti-social Behaviour, Crime and Policing Act 2014](#)

[Forced Marriage guidance](#), FCO & FCDO 2013 (updated 2021)[Malicious Communications Act 1988](#)

[Communications Act 2003](#)

[Public Order Act 1986](#)

[Essex SET Safeguarding Procedures](#)

[Hertfordshire Safeguarding Procedures](#)

[The Modern Slavery Act 2015](#)

[Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#), HMG 2018

[Mental health and behaviour in schools](#), DfE 2018

[The Domestic Abuse Act 2021](#)

Date of Policy Update: September 2025 (this policy may have additional updates between Governor reviews)

Next Review: September 2026

Reviewed by: Whole Board

Signed by: Sam Bristow and Ed Fielding – Co-Chair of Governors

Signed by: Paul Bailey and Anna Lipani – Co-Headteachers