



HEDGEWOOD SCHOOL

Child Protection and Safeguarding Policy

2022-2023

CHILD PROTECTION AND SAFEGUARDING POLICY

Introduction

This policy sets out how Hedgewood School is carrying out its statutory responsibility to safeguard and promote the welfare of children in accordance with Section 175 of the Education Act 2002, Keeping Children Safe in Education 2022 and Working Together to Safeguard Children 2018. It forms part of a wider group of policies around safeguarding children and puts the best interests of the child at the heart of a child centred and co-ordinated approach to safeguarding, ensuring inter-agency working and sharing of information is timely and effective. Hedgewood school complies with the arrangements agreed and published by Hillingdon Safeguarding Children Partnership and the NPCC When to call the police guidance for schools and colleges.

Safeguarding and promoting the welfare of children is defined in guidance from Keeping Children Safe in Education (September 2022) 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
- Taking action to enable all children have the best outcomes.

Hedgewood school does not unlawfully discriminate against pupils because of their sex, race, disability, religion or gender reassignment (protected characteristics). We take positive action, where proportionate, to deal with the disadvantages that these pupils face in order to meet their specific need.

As a primary school for children with special educational needs or disabilities (SEND), the governors and staff at Hedgewood are acutely aware of the extra vulnerability of our pupils and that they may be more at risk of harm. Children with SEND or certain health conditions can face additional safeguarding challenges. We recognise that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

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

To address these additional challenges, Hedgewood school provides a diverse and enriching curriculum for all children with SEND and in particular autism and complex communication needs, with pathways dedicated to functional communication, independent life skills and based on ensuring optimum quality of life experiences and opportunities for life-long learning and well-being. All staff undertake safeguarding and child protection training at induction, including whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. Safeguarding and child protection training will be refreshed at least annually for all staff, and they will receive regular updates throughout the year via email, bulletins and staff meetings.

Our staff are trained to nurture the individual needs of each child and we provide extra support through the provision of our Family Services Team who build trusting and empathetic relationships with our pupils and their families.

The staff and Governing Body of this school are committed to establishing and maintaining an environment where children feel secure, are encouraged to communicate, and are listened to. We will ensure that children know that there are adults in school who they can approach if they are worried, and promote a positive, supportive and secure ethos, to ensure all pupils feel respected and valued.

At Hedgewood school, we support our pupils to develop their self-knowledge, self-esteem and confidence. We encourage pupils to show respect and tolerance of others and develop understanding of right and wrong to fully promote fundamental British values, the rule of law and individual liberty. Understanding the social and communication needs of our pupils is paramount in supporting this through our adapted curriculums.

Aims:

- To ensure that there is a strong safeguarding culture within Hedgewood School
- To ensure that all necessary internal and inter-agency child protection procedures are in place as required
- To be committed to identify families who would benefit from Early Help
- To give training, regular updates and guidance to staff to ensure best practice
- To demonstrate the links with other relevant policies to safeguard the general welfare of children
- To provide a clear statement of the school's responsibilities in the event of a concern about the conduct of a member of staff
- To identify key individuals and their specific roles

Legislation and Statutory Guidance

This policy is based on the following legislation and statutory guidance:

- Keeping Children Safe in Education (2022)
- Working Together to Safeguard Children (2018)
- Governance Handbook
- Section 175 of the Education Act 2002
- The School Staffing (England) Regulations 2009
- The Children Act 1989, 2004
- Statutory Guidance on FGM
- The Rehabilitation of Offenders Act 1974
- Statutory Guidance on the Prevent Duty
- Equality Act 2010

Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff (teaching and non-teaching), governors, volunteers, temporary and supply staff working in the school, and will be reviewed annually by the Governing Body.

All Staff

All our staff will read and understand Part 1 and Annex B of Keeping Children Safe in Education (KCSIE) 2022 at least annually. Their understanding is evidenced by the completion of an assessment that covers the key elements of KCSIE Part 1.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and deputies, Hedgewood safeguarding flowchart, and the safeguarding response to children who go missing from education
- The early help process and their role in it, including sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), FGM and radicalisation

The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Ayo Akinola (Family Services Manager). The DSL takes lead responsibility for child protection and wider safeguarding in the school and is available all year round for staff to discuss any safeguarding concerns and to work in partnership with external agencies including health and social care.

In the absence of the DSL, the deputy DSL's will act as cover. Our deputy DSL's are Mr J Goddard (Headteacher) and Mrs D Owens (Deputy Headteacher). At Hedgewood, we have additional members of the senior leadership team who are also DSL trained; they are Mrs B Smith (Assistant Headteacher), Mrs P Greenwald (Assistant Headteacher) and Miss V Leahy (Assistant Headteacher).

Our DSL will:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and multiagency meetings
- Make appropriate referrals when there is a child protection or safeguarding concern about a child
- Attend Hillingdon safeguarding cluster meetings to ensure all updates on best practice and training is utilised
- Ensure that there is an effective safeguarding training programme for all staff with regular safeguarding briefings to keep staff up to date

The Governing Body:

The Governing Body will:

- Facilitate a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Appoint a link governor for safeguarding [our link governor for safeguarding is Michelle Doherty, Chair of Governors]
- Evaluate and approve this policy at each review
- Read KCSIE 2022 in its entirety.

The Headteacher

The Headteacher is responsible for the implementation of this policy. This policy will be communicated to parents / carers when their child joins Hedgewood and via the school website. The Headteacher will ensure that the DSL has appropriate time, funding, training and resources, and there is always adequate cover if the DSL is absent.

Confidentiality

Timely information sharing is essential to effective safeguarding. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Whilst the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Staff should never promise a child that they will not tell anyone about a report of abuse.

The DSL and deputies will share information in line with the government's information sharing advice for safeguarding practitioners taking into consideration the '7 golden rules' for sharing information. The DSL and deputies will use Egress to securely send confidential information to external email accounts. If Egress is not accessible by the recipient, password protected attachments will be used. If safeguarding information is compromised, the DSL and data protection officer will discuss whether the school should inform any, or all, of our local safeguarding partners.

Our DSL and deputies will be able to keep detailed, accurate, secure records of concerns and referrals and understand the purpose of this record-keeping. Safeguarding records are kept securely on our electronic Safeguard Record Manager which is only accessible by our DSL's with their individual login and password. Safeguard Record Manager is GDPR compliant and is registered with the Information Commissioners Office (ICO). Their data centres all comply to the latest security standards. Any paper records are stored securely in a locked cabinet which is only accessible by DSLs.

Recognising abuse and taking action

All staff, governors and volunteers must follow the procedures set out in this policy and our safeguarding flowchart when they have concerns about a child. Staff will complete a child protection / child concern form as soon as possible and notify the DSL immediately about their concerns. Staff will write down a factual report using the child's

own words, what was said or seen, putting the scene into context, and giving the time and date.

Staff will be aware that children may not feel ready or know how to tell someone that they are being abused. For pupils who with speech, language and communication difficulties, staff will write down a factual report of what they are concerned about, clearly stating any observed behavioural changes or developmental regression where relevant.

Where appropriate, the DSL will discuss any concerns about a child with the child's parent or carer. However, if we believe that notifying the parent or carer would increase the risk to the child, the DSL will discuss this with children's social care before doing so. The DSL will record all concerns, decisions made and actions on our electronic Safeguard Record Manager.

If a child is suffering or likely to suffer harm, or is in immediate danger a referral will be made to children's social care via Hillingdon Stronger Families Hub and / or the police. If the referral has not been made by the DSL, the DSL must be informed as soon as possible.

When a referral has been made to children's social care, 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 referrer know the outcome. If the child's situation does not seem to be improving after the referral, the DSL (or person who made the referral) will escalate their concerns to the children's social care manager and / or seek advice from Hillingdon's Child Protection Lead for Education.

Staff can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

If a child for whom we have, or have had, safeguarding concerns, moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, separately from the main pupil file. In additions, of 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 safety of the child.

Early Help

Our staff will be able to identify children who may benefit from early help, enabling us to provide support as soon as a problem emerges at any point in the child's life. When early help is appropriate, the DSL will generally lead in liaising with other agencies and completing the early help assessment via Hillingdon Stronger Families online portal.

Female Genital Mutilation (FGM)

KCSIE explains that FGM comprises "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 , under the FGM Act 2003, and a form of child abuse with long-standing , harmful consequences. Our staff receive training to recognise the possible indicators that a pupil has already been subjected to FGM, and how to be alert to the potential need for early help for a child who's at risk of FGM. If staff have concerns that FGM has happened or might happen, they will speak to our DSL as soon as possible and make a written record. Staff will not examine pupils. Hedgewood teachers are aware of their

mandatory statutory duty to personally report *known* cases of FGM to the police by calling 101 and sharing information as outlined in the Home Office Guidance: Mandatory Reporting of Female Genital Mutilation – procedural information. A copy of the Home Office Guidance will be made available in the staff room.

The Prevent Duty

Hedgewood school recognises its duty to protect children from the risk of radicalisation and extremist views. We follow the requirements in the Prevent guidance of the four general themes of; risk assessment, working in partnership, staff training and IT policies and practice.

If there is a concern that a child may be vulnerable to extremism or radicalisation, advice will be sought from Hillingdon Prevent Lead and, where necessary, the concern will be reported via Hillingdon 'Front Door for Prevent' which shares the referral with both the police and Hillingdon multiagency safeguarding hub (MASH) to allow the safeguarding concern to be assessed alongside any police risk.

We recognise the vulnerability of not just our pupils but the wider family unit and we are alert to changes in behaviour in our pupils and family dynamics. School safeguarding procedures take into account local strategies and arrangements of Hillingdon Safeguarding Children Partnership. Prevent training is included in our yearly safeguarding training for all staff. Appropriate filters on internet access and vigilance on pupil use and understanding of online safety, protects children from exposure to extremist materials. Hedgewood is committed to working with parents / carers to understand the risk of online safety and effective monitoring of their children's use of technologies.

Mental Health

Mental health problems can, in some cases, be an indication that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest that a child may be experiencing a mental health problem or be at risk of developing one. Where staff have mental health concern about a child that is also a safeguarding concern, they will discuss their concerns with the DSL. If the mental health concern is not a safeguarding concern, staff can seek advice and support from one of our mental health first aiders.

At Hedgewood, we recognise that children with autism are more likely to experience mental health problems than the general population. Early intervention to identify issues and provide effective support is crucial. Our role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos;
- Identification: recognising emerging issues as early and accurately as possible;
- Early support: helping pupils to access evidence based early support and interventions; and
- Access to specialist support: working effectively with external agencies, to provide swift access or referrals to specialist support and treatment such as Child and

Children Missing from Education

Hedgewood has robust and clear procedures for monitoring attendance and responding to absence. Procedures respond to repeated unauthorised absence and the school is alert to the risk of abuse or neglect. We are committed to improving attendance and reducing potential for future risk.

The school will report poor attendance to the Local Authority Participation Team and will make reasonable enquiries jointly with the Local Authority when there are unexplained absences from school. The school follows statutory duty regulations when informing the Local Authority when a pupil's name is removed from the admissions register at times other than standard transition times in education.

The school responds to unexplained absences on a daily basis, contacting parents / carers for an explanation of their child's absence. If a pupil is absent for an extended period (due to ill health or other explained reasons) even when school has an explanation, regular contact is made with the parent / carer by school and a risk assessment completed where necessary.

The DSL will ensure that the relevant social worker is notified by telephone and/or email, if there is an unexplained absence of a pupil who is currently subject to a child protection plan. We respond to daily attendance monitoring by Welfare Call, which is Hillingdon's attendance monitoring service for Looked After Children.

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

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

Child Sexual Exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual and we recognise that children who may be sexually exploited may not understand that they are being abused, particularly children with SEND. CSE can also happen online, for example the child may be persuaded or forced to share sexually explicit images of themselves or take part in sexual activities using a webcam.

The school recognises the ongoing concern regarding the exploitation of children & young people especially in Hillingdon and the wider London area, including an increase in concerns regarding primary age children. We recognise the need for this school to be alert to the risk factors regarding different types of exploitation and youth violence and we know that early intervention is key in helping keep children & young people safe. Our DSL and deputies have attended Hillingdon exploitation awareness training and receive Hillingdon Axis Monthly Bulletins to keep them up to date on local information

and trends regarding risks to young people. We have an understanding of CCE & county lines, CSE, Serious Youth Violence, gang affiliations/culture and missing episodes including current trends and themes in Hillingdon and nationally, signs & indicators for school staff to look out for and what to do. If a member of staff suspects CCE or CSE, they will discuss this with the DSL. The DSL will make referrals where appropriate.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse at home; this exposure can have a serious, long-lasting emotional and psychological impact on children. Our staff are aware that domestic abuse:

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own relationships.

We are part of a joint agency project with Hillingdon Council and the Metropolitan Police called Operation Encompass, to support our pupils and their families who have experienced a domestic incident. Operation Encompass will ensure that our DSL is informed of the incident, so that we can offer discrete support for the family. We aim to provide a secure and caring environment to help reduce the broader effects of domestic abuse.

Child on Child Abuse

To minimise any risk of child-on-child abuse and in accordance with the needs of our population, pupil interactions are monitored and supervised to promote positive social interaction. As the majority of our pupils are autistic, this is an integral part of each curriculum pathway to ensure that our pupils can keep themselves and their peers safe. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and not being reported.

We aim to raise pupils' awareness and build their confidence and resilience so that they have a range of contacts and strategies to support themselves and others as far as possible. Development of self-awareness and keeping themselves safe is embedded in our curriculum pathways. The PSHE & Wellbeing curriculum, Relationships and Health Education (RHE) curriculum, SMSC curriculum, specific Social and Emotional development targets set in pupils Personal Curriculum Plans (PCPs) aim to support our pupils and families at the appropriate stage of their development.

We recognise that this type of abuse (which includes sexual violence and sexual harassment, upskirting and physical abuse) can happen inside and outside of school and online. A zero tolerance of any form of bullying sits alongside our strong safeguarding culture which is rooted in mutual respect and trust. Regular staff training in which new guidance, advice or safeguarding refresher is a priority in the school staff development and induction programme.

Our positive relationships with both pupils and families ensure that any young person who has been subject to any form of child-on-child abuse, receives support to know they are valued, believed and their well-being is paramount. Our family services team work closely with parents to ensure pupils experiences within school enable them to feel safe and know that adults will support them.

At Hedgewood we foster an ethos of positive role models from adults to enable our pupils to interact and communicate with others in a caring and trusting manner.

Undesirable behaviour is challenged, and pupils are supported to develop positive engagement.

If a pupil reports an incident, staff will reassure the child that they will be supported and kept safe.

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

All staff will follow the approach based on guidance from the UK Council for Internet Safety. If staff are made aware of an incident involving the sharing of nude or semi-nude images /videos, they will report it to the DSL.

Staff will not:

- View, copy, print, share, store or save the imagery themselves, or ask the pupil to share or download it
- 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.
- Say or do anything to blame or shame any of the children involved.

The staff member will explain to the pupil in a way that they can understand that they need to report the incident and reassure the pupil(s) that they will receive support.

Online safety

Online safety is an integral part of safeguarding. We have a whole school, cross-curricular approach, with collaboration between school leads, all staff, pupils, and parents. It is essential that children are safeguarded from potentially harmful and inappropriate online material. We aim to have an effective approach to online safety that empowers our school to protect and educate pupils, staff, and parents in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. It is a safeguarding priority as our pupils are known to be more vulnerable online and is detailed in our Online Safety policy.

Our approach to online safety is based on addressing the four categories of risk: Content, Contact, Conduct, Commerce.

To meet our aims and address these risks we will:

- Educate our pupils about online safety in all curriculum pathways
- Train staff on online safety at induction and all staff to receive refresher training at least yearly
- Educate parent/carers about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone / devices
- Ensure everyone is aware of the acceptable use of internet in school, use of the school's ICT systems

- Put in place robust filtering and monitoring systems on the school's IT systems to reduce the risk of children being exposed to the four categories listed above

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. Appropriate staff have relevant information about children's looked after legal status and care arrangements. The DSL has details of children's social workers and relevant virtual school heads. We have appointed a designated teacher, Pearl Greenwald – Assistant Headteacher, who is responsible for promoting the educational achievement of looked after children. The designated teacher will work closely with the DSL to ensure that any safeguarding concerns regarding looked after and previously looked after children are quickly and effectively responded to. Our Designated Teacher Policy fully outlines our aims and how the school promotes the educational achievement of looked-after and previously looked-after children.

Safer Recruitment

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

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

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

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

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - I. For all staff, including teaching positions: criminal records checks for overseas applicants
 - II. For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

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 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.

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

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.

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

Child protection training will be made available for governors to access via The Key (e-learning) and/or the London Borough of Hillingdon to provide them with the knowledge to ensure our safeguarding policies and procedures are effective.

Allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

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

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

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

A 'case manager' will lead any investigation. This will be the headteacher or a member of the senior leadership team. Where the headteacher is the subject of the allegation, this will be the chair of governors. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate, such as the Employee Assistance Programme for access to counselling.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the LADO to determine whether there are any improvements to be made to our procedures to help prevent

similar events in the future.

This will include consideration of (as applicable):

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

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated we will consider the facts (alongside the LADO if they were involved) and determine whether any lessons can be learned and if improvements can be made.

Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

Whistleblowing

It is expected that staff who have concerns about poor or unsafe practice should follow our Whistleblowing Policy. Such concerns will be taken seriously by our senior leadership team who will act in accordance with procedures issued to all schools by the LADO.

A copy of our Whistleblowing Policy will be made available in the staff room and is issued to all new staff in their Welcome Pack. Staff are reassured that any allegations remain confidential and follow fair reporting procedures.

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

Low level concerns will be shared with the headteacher. The headteacher will collect evidence where necessary by speaking:

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct policy. Where appropriate this will be done in consultation with the DSL.

Record keeping

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

Records will be:

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

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

References

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

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