



Safeguarding and Child Protection Policy

Cascade Multi Academy Trust

July 2023



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Online-safety / safeguarding link governor	Rachael Kunze and Liz Montgomery
Date this policy was reviewed	July 2023
Date of next review and by whom	July 2024

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Section 1: Safeguarding at Whiteways Primary School

1.1 Important Contact information

At Whiteways Primary School, all staff recognise that we have a shared responsibility to help keep children and young people safe by contributing to providing a safe environment for children to learn in, identifying children who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and at school. The designated people for safeguarding at Whiteways are:

ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Anna Cousins	0114 2423169
Designated Safeguarding Deputies (DSD)	Hannah Bridgewood Rachael Kunze Tracey Lindsell	0114 2423169
Headteacher	Anna Cousins	0114 2423169
Special Educational Needs and Disabilities coordinator	Jakki Rhodes	0114 2423169
Local Authority Designated Officer (LADO) team	See SCSP website for details.	0114 2734855 (option1) sheffieldsafeguardinghub@sheffield.gov.uk
Chair of Governors Safeguarding Governor	Kay Roe Liz Montgomery	kroe@whitewaysprimary.co.uk lmontgomery@whitewaysprimary.co.uk 0114 243 9391
Designated teacher for looked-after children	Hannah Bridgewood	0114 2423169
Online Safety Coordinator	Rachael Kunze	0114 2423169
Child Exploitation and Online Protection	CEOP	0370 496 7622
National Helpline	NSPCC	0808 800 5000
National Helpline	Childline	0800 1111

1.2 Our Responsibilities

Whiteways Primary School is committed to safeguarding all children.

“Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.” Keeping Children Safe in Education Part 1 (September 2023, Para. 2)

Everyone has a role to play in identifying concerns, sharing information and taking prompt action. Whiteways school will 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

1.3 Aims and School Commitment

To achieve our school aim of each child having the opportunity to reach his or her full potential, it is essential that we ensure that every pupil has a right to protection from abuse of any kind.

This principle is the cornerstone of this policy and will also be supported by the relevant parts of the Anti-Bullying, Behaviour, SEN, Equality, Online Safeguarding, PSHCE, RSE and Health and Safety Policies.

We recognise that for children, high self-esteem, confidence, supportive friends and clear lines of communication with trusted adults helps to prevent and deal more successfully with safeguarding incidents so that children feel safe and protected from any situation or practice that results in a child being physically or psychologically harmed.

We understand that we have a primary responsibility for the care, welfare and safety of the pupils in our school. To achieve this, all staff and volunteers in the school, in whatever capacity, will always act proactively in child welfare matters, especially where there is a possibility that a child may be at risk of significant harm.

Whiteways is a safe place for children and families to feel free to talk if there are difficulties at home. Fears or worries will always be taken seriously. However, staff cannot guarantee confidentiality if concerns are such that a referral to outside agencies must be made in order to safeguard a child’s welfare.

At Whiteways, if we have suspicions about a child’s physical, emotional, or sexual wellbeing, or that they are being neglected, we will take action.

1.4 Legislation and statutory Guidance

This policy is based on the Department for Education’s statutory guidance, [Keeping Children Safe in Education \(September 2023\)](#) and [Working Together to Safeguard Children \(July 2018, updated December 2020\)](#), and the [Governance Handbook \(March 2019\)](#). We comply

with this guidance and the procedures set out by the Sheffield Children Safeguarding Partnership (www.safeguardingsheffieldchildren.org) and we carry out an annual audit of our safeguarding provision (Section 175 Safeguarding Audit, which is a requirement of the Education Act 2002 and 2006), a copy of which is sent to the SCSP.

This policy incorporates the following legislation:

- [Section 175 of the Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- 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.
- [The Children and Families Act 2014](#).
- [The Equality Act 2010](#).
- 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.
- [Multi-agency statutory guidance on FGM \(July 2020\)](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data Protection Act 2018](#)
- [Domestic Abuse Act 2021](#)
- [The Prevent Duty 2015 \(updated April 2021\)](#)
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Statutory [Prevent duty departmental advice \(June 2015\)](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism, and the [Counter-terrorism and Security Act 2015](#)
- The [School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the Single Central Record and the requirement for at least one person conducting an interview to be trained in Safer Recruitment.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- Disqualification under the [Childcare Act 2006 \(as amended, 2018\)](#), which sets out who is disqualified from working with children.
- [What to do if you're worried a child is being abused \(March 2015\)](#), published by HM Government.

- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

This policy also complies with our funding agreement and articles of association.

Section 2: Recognising signs of abuse

2.1 Signs of abuse

Whiteways Primary school adopts the definition used in the Children Act 2004 and the DfES guidance documents Keeping Children Safe in Education 2023, Working together to safeguard children 2018 and the reformed EYFS Framework 2021, which focuses on safeguarding and promoting children and young people's welfare, and can be summarised as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

All staff, governors and volunteers should be alert to and aware of signs and indicators of abuse, and act to protect children who they believe to be at risk of harm.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

There are four types of abuse defined in Keeping Children Safe in Education:

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is

happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

2.2 Recognising signs and symptoms of abuse

Adults may become concerned about abuse of a child in the following ways:

- a child or young person alleges that abuse has taken place or that they feel unsafe;
- a third party or anonymous allegation is received;
- a child or young person's appearance, behaviour, play, drawing or statements cause suspicion of abuse and/or neglect;
- a child or young person reports an incident(s) of alleged abuse which occurred some time ago;
- a report is made regarding the serious misconduct of a worker towards child or young person.

Physical signs define some types of abuse, e.g. bruising, bleeding, burns, broken bones resulting from physical or sexual abuse, or injuries sustained where a child has not been adequately supervised. However, children may have no physical signs, or they may be harder to see, therefore staff also need to be alert to behavioural indicators of abuse:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities, or keep arms and legs covered even in hot weather;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;

- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away;
- Children who shy away from being touched or flinch at sudden movements; and
- Children who are excessively withdrawn, fearful, or anxious about doing something wrong.

Possible signs of emotional abuse

- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

Possible signs of sexual abuse

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Possible signs of Neglect

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

2.3 Vulnerable children

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We recognise children at Whiteways 'diverse circumstances, and we ensure that all children have the same protection, regardless of any barriers they may face.

Children who may be at increased risk include children who:

- Have special educational needs or disabilities (SEND), or health conditions.
- Are young carers.

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse.
- Are misusing drugs or alcohol themselves.
- Are showing signs of being drawn into anti-social or criminal behaviour.
- Are at risk due to either their own or a family member's mental health needs.
- Are at risk of FGM, sexual or criminal exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are Looked After, or Previously Looked After, or are privately fostered.
- Are missing from education, or whose parent/carer has expressed an intention to remove them from school to be home educated.

Section 3: Specific safeguarding issues

Further information about specific forms of abuse and safeguarding issues can be found in [Keeping Children Safe in Education Part 1 \(September 2023\)](#), paragraphs 31-48.

A summary of specific safeguarding issues can be found in the Whiteways Primary School document 'Specific Safeguarding Issues – Quick Reference'.

3.1 Child criminal exploitation (CCE) including County Lines

Child criminal exploitation (CCE) is child abuse where children and young people are manipulated and coerced into committing crimes.

One aspect of CCE is 'County Lines'. This is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets, for example suburban areas and market and coastal towns, using dedicated mobile phone lines or "deal lines". This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. County lines exploitation:

- Can affect any child or young person under 18 years of age
- Can affect any vulnerable adult over 18 years of age
- Can still be exploitation even if it appears consensual
- Can involve force, enticement-based methods and violence or threats of violence
- Can be perpetrated by individuals, groups, males, females, young people or adults
- Is typified by some form of power imbalance

A child or young person might become involved in CCE for many reasons, including:

- peer pressure and wanting to fit in with their friends
- they feel respected and important
- they want to feel protected from other gangs, or bullies
- they want to make money, and are promised rewards
- they want to gain status, and feel powerful
- they've been excluded from school and don't feel they have a future.

There are some signs to look out for if you're worried a child or young person has joined a gang, or is being criminally exploited.

- Frequently absent from and doing badly in school.
- In a relationship or hanging out with someone older than them.

- Being angry, aggressive or violent.
- Being isolated or withdrawn.
- Using new slang words.
- Spending more time on social media and being secretive about time online.
- [Selfharming](#) and feeling emotionally unwell.
- Committing petty crimes like shop lifting or vandalism.
- Unexplained injuries and refusing to seek medical help.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

3.2 Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status, and can involve violent, humiliating and degrading sexual assaults but does not always involve physical contact and can happen online; for example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

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

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

3.3 Carrying knives/offensive weapons, gang culture and serious violence

Children bringing and carrying a knife/offensive weapon onto Whiteways' premises is a criminal offence and immediate action could be taken by calling the police. The guidance on 'Searching, Screening and Confiscation for Head teachers, schools and Governors, January

2018' will be consulted and we will consider and may apply the disciplinary procedure. If a member of staff suspects a pupil/student being involved in gang culture, this is a safeguarding concern and will require a discussion with the DSL who will seek advice from agencies and professionals including reference to the safeguarding procedures as outlined by the local authority. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

3.4 Children missing from education (CME)

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

Children may be at risk who are absent on repeat occasions, or for prolonged periods.

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

- Are at risk of harm or neglect
- 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

School will ensure that there are at least 2 emergency contacts for each child in case of non-attendance with no contact from parents. This contact information will be used to obtain a reason for absence.

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

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

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

Further information can be found in [Children missing education: statutory guidance for local authorities \(September 2016\)](#).

3.5 Child-on-child abuse, including sexual harassment

We recognise that children are capable of abusing their peers. This is referred to as child on child abuse. Child on child abuse is the physical, emotional or sexual abuse of a child or young person by their peer(s) on or offline, and may include:

- Bullying, including prejudice and discrimination
- Cyberbullying and youth-produced sexual imagery
- Sexual violence, harassment, comments, jokes, non-consensual sexual activity
- Sharing of nude and semi-nude images and/or videos
- Abuse in intimate personal peer relationships
- Up-skirting (photographing genitals or buttocks for sexual gratification and/or victim distress)
- Physical abuse and assault (or threats to harm)
- Initiation and hazing rituals, humiliation & violence

Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up', as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. All child on child abuse is unacceptable and will be taken seriously.

Abuse can occur at any time, inside or outside a setting, and will always be assessed by the safeguarding team if it involves one of our pupils. Most cases of pupils hurting other pupils will be dealt with under our school's Behaviour Policy, but this Safeguarding Policy will apply to any allegations that raise safeguarding concerns.

In instances of child on child abuse, we will take action by:

- Always taking complaints seriously
- Never asking a student for a written statement; it can interfere with a criminal investigation
- Assessing the needs of the victim and perpetrator
- Considering a referral to Police or Social Care
- Contributing to multi-agency assessments
- Convening a risk management meeting
- Recording all incidents and all action taken

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

- Staff must tell the DSL and follow the school's recording procedures, but do not investigate the allegation.
- The DSL will make a referral to the local authority children's social care team if necessary, and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- A risk assessment and support plan will be put into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed. The Sheffield Children Safeguarding Partnership [Child-on-Child Abuse and Risk Assessment \(September 2022\)](#) guidance will be followed.

We will minimise the risk of child on child abuse by:

- Having an ethos where students and staff are respectful and recognise the effect of their actions.
- Challenging any form of derogatory or sexualised language or behaviour.

- Openly discussing any issues that could motivate bullying, and developing strategies to prevent this.
- Addressing issues early between pupils which might later provoke conflict.
- Involving students and parents to ensure they know what to do to prevent and report concerns.
- Being 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.
- Helping staff understand the needs of SEND, disabled, lesbian, gay, bisexual and transgender pupils, and creating an inclusive, safe environment where pupils can openly discuss issues without fear.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially, for example through setting standards introductions and during 1:1 support sessions.
- Ensuring staff are trained to understand 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.

3.6 Children who identify as lesbian, gay, bisexual or trans, or those questioning their sexual or gender identity (LGBTQ+)

At any one time at Whiteways, there may be children who are questioning or exploring their own sexual or gender identity. We recognise that the experience of these children can be complex and they may require additional support from school to ensure they are safe. Although questioning or exploring sexual or gender identity is not in itself an inherent risk factor for harm, children can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded for children who lack a trusted adult with whom they can be open. It is vital that school staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBTQ+ inclusion is part of the statutory curriculum and we reference this throughout our RSE and PHSE curriculum.

Further information can be found in the Stonewall guidance '[An Introduction to supporting LGBTQ+ Children and Young People](#)', or on the [Barnardo's](#) website.

3.7 Domestic abuse (including Operation Encompass)

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

Domestic abuse can be psychological, physical, sexual, financial or emotional, and can involve coercive control, harassment and stalking. Domestic abuse can also happen online or through digital media.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer abuse in their own intimate relationship. School staff are aware of the long-term impact this will have on children's wellbeing, health, development and ability to

learn. Staff have received Trauma Informed training to help identify, support, and raise an increased awareness of the wider impact of trauma, including that caused by being witness to or suffering domestic abuse, and how to support children who show signs of this, following the appropriate safeguarding procedures where concerns arise.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the DSL through an Operation Encompass notification before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

3.8 Harmful sexual behaviour

Sexual behaviour is an expected part of child development and in itself is not a cause for concern. As with any type of behaviour, children need advice and guidance to navigate their feelings and the situations they encounter. Children learn about sex and relationships in a variety of ways including from parents, siblings, wider family, friends, school, faith groups, personal experience and media including magazines, books, TV, streaming services and websites.

We have carefully planned our RSE (Relationships and Sex Education) curriculum to meet the needs of our pupils to ensure that they have a secure and age appropriate understanding of the different elements. Our RSE curriculum aims to ensure that pupils are well informed and prepared to live safe and healthy lifestyles. We have worked closely with parents and families to develop the RSE curriculum.

In order to respond appropriately to a child displaying problematic or harmful sexual behaviour, we will look at each situation individually, as well as considering any patterns of behaviour. Children naturally explore and experiment with their sexuality as they grow up. If the behaviour seems to go beyond curiosity, for example if it is obsessive or compulsive, this might indicate it is problematic or harmful.

More information about developmentally typical sexual behaviour for different ages can be found [here](#).

How we respond to sexual behaviour

We use [Hackett's model](#) to identify harmful sexual behaviour.

Normal behaviours on the Hackett continuum model:

- When a member of staff witnesses or becomes aware of a child displaying normal behaviour they have an opportunity to provide information, guidance and support whilst positively reinforcing appropriate behaviour.
- Listen to what the child has to say and respond calmly and non-judgementally.
- Talk to the child about sexual development and healthy relationships. Let the child know they can always talk to you if they are ever worried about anything.
- Talk to parents about developmentally typical sexualised behaviours and explain how they can have discussions about appropriate sexual behaviour with their child.
- Signpost helpful resources such as the NSPCC PANTS activity pack.
- Pass on any concerns following whole school procedures.

Inappropriate behaviours on the Hackett continuum model:

- Although these behaviours are not abusive or violent, they require staff attention, monitoring and action.
- Listen to what the child has to say and respond calmly and non-judgementally.

- Follow child protection procedures and talk to the DSL or deputy.
- Take the opportunity to provide education about healthy and safe relationships. Recognising that behaviour is unhealthy can help to prevent harmful behaviour developing.
- The child will need support to help them change their behaviour and stop the behaviour escalating. Consider whether this support can be provided by school or if multi-agency response is required.
- Problematic sexual behaviours might also indicate that a child has experienced trauma or abuse, so it's important to respond appropriately to keep the child safe.

Problematic, abusive and violent behaviours on the Hackett continuum model:

- If a child is displaying harmful sexual behaviour, staff should take immediate action and intervention to keep everyone involved safe. Staff should consider whether the child displaying the behaviour is at risk and take the necessary action to protect them. Staff also need to act to mitigate the risk their behaviour may pose to others.
- Staff must follow the school's child protection procedures and report concerns to the DSL or deputy.
- In every case the DSL or deputy will make a referral to Sheffield Children's Social Care by contacting the Sheffield Safeguarding Hub. Where referrals meet the threshold for social care intervention, a social worker will assess and implement a safety plan. They will make a recommendation about what interventions and services are needed to protect victims and ensure the young person and family are supported, and make a referral to Sheffield's Harmful Sexual Behaviour panel.
- Following the immediate response, the child will need follow-up support which will include swiftly providing education about safe and appropriate sexual behaviour. It may also include monitoring and safety plans, 1:1 intervention and/or counselling. Allocation of roles must be made in a multi-agency context including the social worker.

3.9 So called "honour-based" violence, including Female Genital Mutilation (FGM) and forced marriage

So called "honour-based" violence (HBV) includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. This may include FGM, forced marriage and practices such as breast ironing. This often involves a wider network of family or community pressure. All forms of HBV are abuse and should be reported following school safeguarding procedures.

FGM

Keeping Children Safe in Education 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 and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally, by ringing **101**. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have a good reason not to, teachers must still consider and discuss any such case with the DSL or deputy, and involve children's social care as appropriate. Staff must not examine pupils.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL or deputy and follow our local safeguarding procedures.

Any member of staff, including teachers, who suspects a pupil is *at risk* of FGM, must speak to the DSL or deputy immediately. This will be followed by an immediate referral to children's social care.

Further information can be found on the [Sheffield Children Safeguarding Partnership fact sheet](#). Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A family member disclosing that FGM has been carried out.
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

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

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the LADO.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmv@fco.gov.uk.
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

3.10 Looked-after and previously looked-after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. We are also aware that a previously looked-after child potentially remains vulnerable and this requires staff to have the skills, knowledge and understanding to keep them safe. We understand that all agencies must work together and take prompt action on concerns to safeguard these children, who are a particularly vulnerable group. The school will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed.

The Designated Teacher for Looked-After Children at Whiteways is Hannah Bridgewood, who has the responsibility for promoting the educational achievement of those children who are currently looked-after or have left care. The virtual school head at the local authority manages the pupil premium plus grant for looked-after children. The designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of the looked-after children in the school and meet the needs identified in each child's personal education plan. The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked-after children. Statutory guidance on promoting the education of looked-after children contains further information on the roles and responsibilities of virtual school heads.

Further information can be found in the Whiteways School 'Looked-After Children Policy (summer 2022)'.

3.11 Children with family members in prison and part of the court system

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. A guide for 5-11-year olds explains each step of the process and the support and special measures that are available. Making child

arrangements via the family courts following separation can be stressful and entrench conflict in families, including for the children involved. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service.

3.12 Parent Alcohol and Drug Use

Parents/carers with a dependency on alcohol and/or drugs can negatively impact children's physical and emotional wellbeing, their development and their safety. The impacts on children include:

- physical maltreatment and neglect
- poor physical and mental health
- development of health harming behaviours in later life, for example using alcohol and drugs and at an early age, which predicts more entrenched future use
- poor school attendance due to inappropriate caring responsibilities
- low educational attainment
- involvement in antisocial or criminal behaviour

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

3.13 Mental health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. It is important that staff understand that children's vulnerabilities related to mental health may be that they could be more likely to be impacted by other safeguarding concerns. Staff should be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, they should take immediate action, following the steps outlined in Section 5, including information about the child's mental health.

If staff have a mental health concern that is not also a safeguarding concern, they should speak to the Pastoral team to agree a course of action. We will consider a referral to the Primary Mental Health consultation team at the Family Inclusion Service. Parents may be advised to seek advice from their GP, who is able to make a referral to CAMHS.

3.14 Sexual violence and sexual harassment, including 'upskirting'

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can occur through a single child or group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and face to face (both physically and verbally) and are never acceptable. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

'Upskirting' is a form of sexual harassment where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Staff should be aware of the importance of:

- challenging inappropriate behaviours
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

3.15 Sharing of nude / semi-nude images and/or videos (or youth produced sexual imagery)

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. There are examples of children of all ages sending and receiving indecent images through social media or messaging services.

It is against the law to make, share or possess images of children (anyone under the age of 18), or that have been generated by children. Sharing of nude / semi-nude images and/or videos can be a form of peer abuse.

Disclosures about the sharing of nude / semi-nude images and/or videos should follow normal safeguarding protocols. Staff should:

- Confiscate and secure the device(s) involved.
- Not view, copy, print, share, store or save the imagery, or ask a child to share or download – this is illegal. If the staff member has had already viewed the imagery by accident (e.g. if a young person has showed it to them before the staff member could ask them not to), they must report this to the DSL (or equivalent) and seek support.

- Explain to the child that it must be reported it and reassure them that they will receive support and help from a member of safeguarding staff.

If staff are made aware of an incident involving the sharing of nudes or semi-nudes, or Youth Produced Sexual Imagery, they must report it to the DSL immediately. Staff **must not**:

- View, download or share the imagery themselves, or ask a pupil to share or download it. If a staff member has already viewed the imagery by accident, this must be reported 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.

The staff member should explain that they need to report the incident, and reassure the pupil(s) that they will receive support and help from the safeguarding team.

Parents will be informed at an early stage and kept involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm. If it is necessary to refer an incident to the police, this will be done through dialling 101.

All incidents of sending or receiving indecent images, and the decisions made in responding to them, will be recorded in line with school recording procedures.

Pupils are taught about the issues surrounding youth produced sexual imagery as part of our PSHCE education and computing programmes. Teaching covers the following and is age appropriate:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

3.16 Online safety, including school filtering and monitoring systems

There is a separate Online Safety Policy that outlines the Trust aims regarding online safety, Legislation and Guidance, Roles and Responsibilities regarding online safety, the online safety curriculum, acceptable use of the internet and devices, and monitoring arrangements.

Helping children to stay safe online

Online safety is part of the statutory computing curriculum and is a focus in other areas of the curriculum, particularly around pupils' use of the internet. Pupils need to learn to evaluate online information and to take care of their own safety and security when using technology.

Safeguarding concerns around pupils' use of technology will be dealt with following the school's normal safeguarding procedures. We recognise that in some instances, parents wish for their child to bring a mobile phone to school for use when walking to and from school. This must be switched off on arrival at school and must be handed over to the class teacher for safekeeping on entry to the building.

To help keep children safe online, we will educate pupils about online safety as part of our curriculum, including:

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

We will educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

Monitoring and filtering

Robust filtering and monitoring systems are in place to limit children's exposure to risk from the school's IT systems. We use Smoothwall Filtering at Whiteways. This appliance stands between the school and the internet and acts as our filtering, and our firewall. It monitors traffic coming into and out of school; it follows a set of predefined rules and blocks any content which is inappropriate. A notification is then sent automatically to the DSL. A daily report goes to the DSL detailing any relevant information each day.

Keeping Children Safe in Education 2023 issues guidance around the newly published standards for filtering and monitoring in school included in [Meeting digital and technology standards in schools and colleges March 2023](#), in particular that all staff are to understand their role in this and the DSL is expected to have the 'lead responsibility'.

3.17 Preventing radicalisation and the Prevent Duty

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremist ideology associated with terrorist groups.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Terrorism is an act that:

- Endangers or causes serious violence to a person / people,
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

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

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Further information can be found in the [Revised Prevent Duty Guidance: for England and Wales \(Updated 1 April 2021\)](#).

3.18 Private fostering

Private fostering is an arrangement that is made privately without the involvement of the local authority. It applies to the care of a child under the age of 16 (or under 18 if disabled) by someone other than a parent or close relative, for 28 days or more (including occasional short breaks).

A 'close relative' is a grandparent, brother, sister, aunt or uncle, step-parent, whether of 'full blood' or 'half-blood' or by marriage/civil partnership.

The Children Act 1989 places a duty on all professionals involved (including education settings) to notify the local authority immediately when they are aware of an intention to begin a private

foster care arrangement, or when they are notified of such circumstances. This should be reported to the DSL/DSD following school reporting procedures.

3.19 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and antisocial behaviour, as well as the family being asked to leave a property.

3.20 Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are always expected to have their photo taken have their name and company logged on the school electronic system and wear their printed ID badge. Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

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

3.21 Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Check for information about changes to the normal collection routines.
- Make all reasonable attempts to contact parents, carers or others with parental responsibility at home or at work, and other adults authorised to collect the child or vulnerable young person from the setting.
- Not allow the child to leave the premises with anyone other than parents, carers or another authorised person.
- If no-one can be contacted to collect the child or vulnerable young person after one hour after the end of school, the relevant Children's Social Care Area Team or Police will be contacted.

- The child or vulnerable young person will stay at the setting in the care of two DBS checked staff members until safely collected either by the parent, carer, other authorised person, social worker or police officer.
- If necessary Children's Social Care will assess the child or vulnerable young person's situation and find appropriate and safe alternative accommodation if needed.
- Make a full written report of the incident and outcome using CPOMS.

3.22 Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Organise an immediate search of the school premises – if child is found we will use post incident learning (regulate, reflect and repair) and discussion to understand the situation
- If the child remains missing we will contact the parents and begin search of immediate area
- A member of SLT will contact the police giving a description of the missing person
- An investigation and learning discussion will take place following the incident and recorded on CPOMS
- Security procedures will be reviewed
- The Headteacher or Executive Headteacher will manage any publicity in relation to the incident

3.23 Other Vulnerable Groups

Home Educated Children can be more vulnerable than other children. The school has a responsibility to those who are thinking about or who are about to home educate, including those who have been removed from the school roll with a view to home educate.

Young carers can be more vulnerable or placed at risk. It is important to identify young carers and ensure they are supported to help reach their potential with an understanding that the school will need to refer into early help social care services for an assessment of their needs and to Sheffield Young Carers if the child agrees.

Private fostering occurs when a child is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. The schools have a duty to notify the local authority via the Safeguarding Hub if it is thought or known that a child or young person may be Privately Fostered or subject to a host family arrangement which is unclear or ambiguous.

Children with Social Workers may be vulnerable and be educationally disadvantaged in attendance, learning, behaviour and mental health. Local authorities routinely share the fact a child has a social worker with school. DSL to hold this information and share with the appropriate staff to ensure the child's needs are met.

Section 4: Safeguarding roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the Sheffield

Children Safeguarding Partnership. Our policy and procedures also apply to extended school and off-site activities.

4.1 All staff

All staff will be aware of, and follow:

- Our systems, which support safeguarding, including the staff Code of Conduct and the role of the designated safeguarding lead (DSL) and designated safeguarding deputies (DSD).
- Their responsibility to provide a safe environment in which children can learn.
- The early help process and their role in it, identifying emerging issues and children who may benefit from early help, liaising with the DSL or deputy, and sharing information with other professionals to support early identification and assessment.
- The referral process in school 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 importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- What to look for to identify children who need help or protection, the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE) and child criminal exploitation (CCE), indicators of being at risk from, or involved with, serious violent crime, FGM and radicalisation.
- Whistleblowing procedures and what to do in the event they have any concerns about the behaviour of an adult in school, that this should be reported to the Headteacher, no matter how low-level they may believe the concern to be, and that a concern about the Head teacher should be referred to the Chair of the Trust Board. All staff must be alert to the behaviour of other adults towards the children in Whiteways School, including colleagues, visitors and external professionals. Staff have a duty to promote the wellbeing of all pupils and should follow the principle of 'It could happen here'. The Whiteways School Whistleblowing policy sets out staff members' responsibilities regarding reporting of concerns, including those felt to be low-level (concerns/allegations that do not meet the harm threshold).

All staff will read and understand the following documents annually:

- Part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(September 2023\)](#), to be familiar with, and have a good understanding of the guidance.
- Whiteways Primary School Safeguarding Policy
- Staff Code of Conduct

and the following documents on induction and as required after that (for example, following an update or review, or as part of further training):

- [Guidance for safer working practices for those working with children and young people in education settings \(Feb 2022\)](#)
- [What to do if you're worried a child is being abused \(March 2015\)](#)
- [The Prevent Duty \(June 2015\)](#).
- Social networking policy
- Whistleblowing policy

Through the curriculum and wider learning in school, children will be provided with opportunities and experiences that teach them about safeguarding and enable them to recognise when they are at risk and how to get help when they need it.

Staff will participate in appropriate training, including a safeguarding induction as soon as they commence employment, regular safeguarding updates including through staff meetings, emails and relevant documents, and basic safeguarding training at least every 3 years.

Staff should always act in the best interests of the child when concerned about their welfare.

4.2 The Designated Safeguarding Lead (DSL) and deputies

The DSL is **Anna Cousins**, Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding and can be contacted via the school telephone number 0114 2423169 or by email acousins@whitewaysprimary.co.uk

When the DSL is absent, the deputies – **Hannah Bridgewood**, Assistant Head, **Rachael Kunze**, Deputy Head, and **Tracey Lindsell**, Pastoral Manager – will act as cover and can be contacted via the school telephone number (0114 2423169) or mobile telephone 07917915161. If the DSL and deputies are not available, **Lindsay Baxter**, Assistant Head, **Sarah Scholes**, Assistant Head or **Sarah Cass**, Specialist IR teacher will act as cover.

The DSL and deputies 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.

The DSL will also keep the Headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL are set out in their job description. The DSL and deputies will attend all relevant training including annual advanced safeguarding refresher training and specific issued training as appropriate.

4.3 The Governing Board and School Leaders

The governing board and school leadership have responsibility for the school's safeguarding and child protection arrangements and will:

- Create a safe environment and 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.
- Ensure that children are taught about safeguarding and how they can keep themselves safe, including online, as part of a broad and balanced curriculum.
- Evaluate and approve this policy at each review, ensuring that they understand this policy and their role in the leadership of safeguarding in the school.
- Ensure that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.

- Ensure that all staff in school read the Safeguarding Policy and Part 1 of Keeping Children Safe in Education annually, and understand their responsibility to safeguard children.
- Communicate this policy to parents when their child joins the school and via the school website so that parents know the school's safeguarding principles and their role in these.
- Ensure that the DSL and deputies have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensure that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Ensure that all child protection and safeguarding records are kept securely, accessible to authorised staff only, and that records are transferred as soon as a child leaves the school.
- Ensure that all staff and volunteers are made aware of the school's Whistleblowing policy, and their role in this.
- Ensure that procedures are in place for handling allegations against staff and volunteers, including low-level concerns, and ensuring that, where necessary, concerns are reported to the Local Area Designated Officer (LADO). The Headteacher will act as the case manager in the event of an allegation of abuse being made against a member of staff or volunteer. The chair of the trust will act as the case manager in the event that an allegation of abuse is made against the Headteacher, where appropriate.
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The designated safeguarding governor is Liz Montgomery. The safeguarding governor can be contacted via the school telephone number 0114 2423169.
- Coordinate a response in the event of the school being required to contribute to a serious case review.

4.4 Creating an ethos of safety

We aim to create an environment in which:

- All staff, including governors and volunteers, feel able to raise concerns and are being supported in their safeguarding role.
- The buildings, including its surroundings, are safe and somewhere where children can feel safe.
- Parents/carers know about our principles on safeguarding and their role in it.
- There are clear protocols on reception for visitors and contractors with procedures in place to ensure the appropriate questions are asked and checks made.

Safeguarding in the Curriculum

The curriculum at Whiteways addresses various aspects of safeguarding and ways in which children can keep themselves safe.

The curriculum, in subjects such as PHSCE, online safety and RSE discusses relevant issues with the children. Topics include such themes as Drugs, Sex and Relationships and Stranger Danger. Children are encouraged to explore and discuss these issues and are equipped with skills they need to stay safe and know whom to turn to for help. The curriculum is designed so that safety issues within the subject are discussed and safe practices taught, such as:

- Using equipment properly in PE and Design and Technology
- Road safety (Road Safety Officers)

- Food hygiene and healthy choices
- Online safety lessons incorporated into all ICT lessons and taught discretely
- Water safety through swimming

Following consultation with parents, a planned RSE curriculum is delivered in regularly timetabled lessons. Our program is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program will tackle at an age-appropriate stages issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to consent, exploitation, abuse, grooming, coercion, harassment, so called honour-based violence such as forced marriage and and how to access support

For more information on the RSE and PHSCE curriculum, please see the relevant policy. We also have a comprehensive online safety policy. For more information, please see relevant curriculum information. Governors are aware of this curriculum.

Reporting systems for pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account using the Signs of Safety model, 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.
- Children report their concerns to any member of staff in school. Staff will reassure the children and explain that they will talk to a member of the safeguarding team who will also come and speak to them.
- Children will be made aware of who they can talk to in school through class discussions and assemblies.
- Children will also be asked who they feel they can talk to in school if they are feeling worried
- Children will always be reassured that they will be listened to and that their opinions and views are valued, staff will inform children of actions to be taken.

Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL or deputy will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL or deputy.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved, following advice from the local authority children's social care team.

Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

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.

Section 5: Safeguarding procedures and processes

5.1 Early help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation

- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- 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 alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

If early help is appropriate, the DSL or deputy 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. The DSL or deputy will keep the case under constant review and the school will consider a referral to the local authority children's social care if the situation does not seem to be improving.

5.2 If a child is in immediate danger

Staff should act on concerns **immediately**, by speaking directly to the DSL or deputy. **Anyone can make a referral** to children's social care if they believe a child is suffering, or is likely to suffer, from harm or is in immediate danger. Staff should tell the DSL as soon as possible if a referral is made directly.

5.3 If a child makes a disclosure

If a child discloses a safeguarding issue to a staff member, the staff member should:

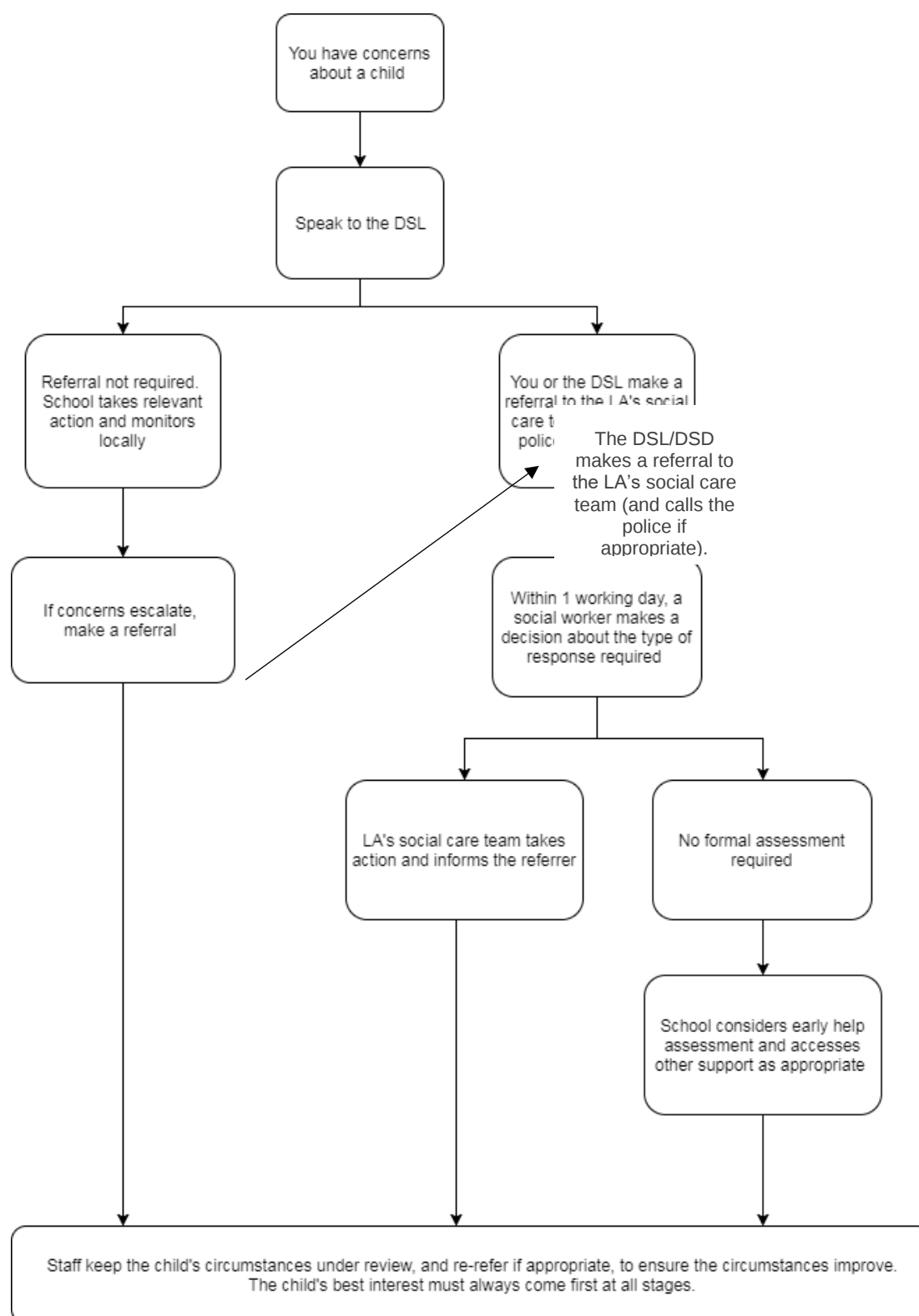
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Record your conversation as soon as possible in the child's own words. Stick to the facts, exact words and phrases and actions, and do not put your own judgement on it.
- Sign, date, write your name, role and the time on your write-up and pass to the DSL or deputy. If the child is in immediate danger, speak immediately to the DSL or deputy as well as adding the incident. If appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from those people, do not disclose the information to anyone else unless told to do so by the relevant authority involved in the safeguarding process. A member of the safeguarding team will upload the notes to CPOMs.

5.4 If staff have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure (Cause for Concern form) to follow if staff have concerns about a child's welfare and the child is not in immediate danger. They should speak to the DSL or

deputy first to agree a course of action. Staff can also contact the charity NSPCC on 0800 800 5000 if advice is needed on the appropriate action.

Figure 1: Procedure if you have concerns about a child's welfare



5.5 Referral

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

If a staff member makes a referral directly (see section 7.1), they should inform the DSL or deputy as soon as possible.

This will initially be made by telephone to the Sheffield Safeguarding Hub screening team (telephone 0114 2734855), and will be followed up by the completion of a [Multi-Agency Confirmation Form \(MACF\)](#).

Essential information for making a referral includes:

- Full names and dates of birth for the child and other members of the family
- Address and daytime phone numbers for the parents/ carers, including mobile
- Whereabouts of the child (and siblings)
- Details of the concern – description of injuries/circumstances which are causing concern, details of any explanation or comment from the child or carer.
- Detailed information to support the belief that abuse has occurred.
- Any background/ contextual information
- The details of the person making the referral
- Special needs of the child, including need for an accredited interpreter etc.
- A clear indication of the family's knowledge of the referral and whether they have consented to the sharing of confidential information.

Other information that may be essential:

- Previous addresses and addresses of wider family members
- Schools and nurseries attended by the child and others in the household
- Name, address & phone number of GP/Midwife/Health Visitor/School Nurse
- Hospital ward/consultant/Named nurse and dates of admission/discharge
- Details of other children who may be in contact with the alleged abuser
- Details of other practitioners involved with the family
- Child's legal status and anyone not already mentioned who has parental responsibility
- History of previous concerns and any previous CAF or Initial Assessments completed
- Any other information that is likely to impact on the undertaking of an assessment or Section 47 Enquiry.

The local authority will decide within 1 working day of a referral about what course of action to take, and will let the person making the referral know the outcome. The 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 person who made the referral must follow local escalation procedures to ensure the concerns have been addressed and the child's situation improves.

5.6 Record keeping

All safeguarding concerns, discussions, decisions made, and the reasons for those decisions, must be recorded in writing.

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.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained in line with the Sheffield Children Safeguarding Partnership procedures, including the [Pupil Transitions \(September 2022\)](#) and the [Secure Storage of Safeguarding Files and Access Requests \(September 2022\)](#) guidance.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main Pupil Record. 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 make any necessary preparations to ensure the safety of the child.

Records are kept electronically on CPOMS. 'Cause for Concern' forms are also available for staff in the staff room, main office, kitchen, nursery and SLT offices. These should be immediately passed on to the DSL or deputy and will be scanned onto the child's record on CPOMS.

Information is shared with other agencies when appropriate, in line with the Sheffield Children Safeguarding Partnership [Information Sharing \(September 2022\)](#) policy. Information is shared to:

- Ensure the fullest possible picture of the child's circumstances.
- Enable practitioners to assess the needs of the child properly.
- Coordinate and improve service provision to the child and family.
- Protect other adults and children.

Where children leave the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The DSL will ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.

5.7 Confidentiality

The CPOMS system is set up so that staff have an appropriate level of access to the information, and the system is accessed via secure individual passwords. Staff must **NEVER** leave any documents relating to safeguarding accessible for perusal by anybody else, including other staff members, children, anyone with parental responsibilities or outside agencies. Staff must be logged out of CPOMS when not actively using the system.

Timely sharing of information is vital to safeguarding and promoting the welfare of children through multi-agency working, co-ordinating offers of early help, reducing the risk of harm and assisting with public protection. Although confidentiality remains of the upmost importance, it must not be a barrier to effectively safeguarding or protecting a child. Consent to share information will be sought whenever possible and staff will be open and honest with children and their families about why, what, how and with whom their information will be shared.

Information is always shared on a need-to-know basis, but consent is not needed if a child is suffering, or is at risk of, significant harm. Staff will never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.

Keeping Children Safe in Education (2023) states that "DPA [Data Protection Act] and UK GDPR [General Data Protection Regulation] do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children." (para 57).

[Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#) guidance is always followed.

5.8 Training

All staff

All staff members undertake safeguarding and child protection training at induction, including whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of abuse or neglect. This training content is regularly updated and is in line with guidance from the Sheffield Children Safeguarding Partnership. Basic Safeguarding training is completed as a whole school every 3 years, or individually as new staff join the school.

All staff receive training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff also receive regular safeguarding and child protection updates (for example, through emails and staff meetings) as required, but at least annually.

Volunteers receive training appropriate to the role that they are carrying out.

Early Years Leadership staff complete Safeguarding Under 5s training.

DSL and deputies

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

Governors

The lead safeguarding governor receives training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of the Trust may be required to act as the case manager if an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

All governors receive regular updates regarding safeguarding in school and specific safeguarding issues.

Safeguarding supervision

Members of the safeguarding team who have contact with children and families have supervision which provides them with support and coaching, promotes the interests of children and allows for confidential discussions of sensitive issues.

5.9 Safer recruitment and employment checks

All information on recruitment checks that are carried out is recorded 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.

We must prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check all staff who work with children. To ensure we recruit suitable people, those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training, and safer recruitment expectations as outlined in 'Keeping Children Safe in Education' are followed.

We ensure that our application packs contain a link to this policy.

Short Listing

The shortlisting process involves a minimum of 3 people. Any inconsistencies are considered, along with any gaps in employment and reasons given for these. All potential concerns are investigated at interview. Shortlisted candidates are asked 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.

In addition, as part of the shortlisting process, we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

References

We seek references to allow school to obtain factual information to support appointment decisions. We obtain references before interview, where possible, as this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview. Any references collected should not include any repeated concerns or allegations that have been found to be false, unfounded, unsubstantiated or malicious. We do not accept open references and ensure that 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. We secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. We compare the information on the application form with that in the reference and take up any inconsistencies with the candidate in order to resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we:

- 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.
- All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

Pre-appointment vetting checks

We follow requirements and best practice in retaining copies of these checks, as set out below. This includes:

- Verifying the identity of candidates
- A check of professional qualifications
- Checking the right to work in the UK
- DBS checks
- Prohibition checks (where required)
- Section 128 checks (where required)
- Suitability checks (i.e. disqualification from working in a schooling environment)
- Additional overseas checks where relevant
- Asking for and follow up at least two references
- Scrutinising applications for gaps in employment.

Under the 2018 regulations, we are no longer required to establish whether a member of staff is disqualified by association. Disqualification by association is only relevant where childcare is provided in domestic settings. Accordingly, we are not entitled to ask their staff questions about cautions or convictions of someone living or working in their household.

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.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

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

the trainee has been judged by the provider to be suitable to work with children. In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:

- Provide an application form to be completed before meeting with the Volunteer Coordinator in school.
- Obtain two references.
- Obtain an enhanced DBS check with children's barred list information for all volunteers before they begin a placement.
- Complete an induction and training programme, including safeguarding and health and safety procedures.

Governors

All governors and trustees 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 of trustees will have their DBS check countersigned by the secretary of state.

Staff working in alternative provision settings

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

5.10 Use of school premises for non-school activity / ex. Curricular

Should the school hire/rent out the school facilities or premises to organisations or individuals it will ensure that appropriate arrangements are made to keep pupils safe.

Activities which are supervised directly by school staff – usual safeguarding practice is observed. Where activities are provided by separate services- Whiteways will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place. The school should ensure that safeguarding requirements are included in any transfer of control agreement. Extracurricular activities and clubs hosted by external bodies will work in collaboration with school to safeguard children. Staff and volunteers running extracurricular activities/ clubs need to be aware of their safeguarding responsibility.

Section 6: Dealing with allegations of abuse against staff and volunteers

6.1 Allegations that may meet the harm threshold.

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

- Behaved in a way that has harmed a child, or may have harmed a child, or

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

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

A case manager will lead any investigation. This will be the Headteacher, or the Chair of the Trust where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Any allegation of abuse against a member of staff or volunteer will be dealt with quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation, in line with Part 4 of Keeping Children Safe in Education, Sept 2023.

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

These procedures are in line with the Sheffield Children Safeguarding Partnership guidance: [‘Allegations and Concerns About Staff and Volunteers in Education Settings’ \(September 2022\)](#).

Suspension

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

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

If in doubt, the case manager will seek views from the schools HR adviser, 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
- **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 a 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 continuing with the steps below.
- Refer the allegation to the designated officer team at the local authority (LADO). Referrals are made using the LADO referral form 2021 on the Sheffield Children Safeguarding Partnership website. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, a referral may be made to Children's Social Care.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. Each case will be considered individually and

appropriate support will be tailored to individual needs. (This may include counselling, the Listening Service or medical advice).

- 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 on-going. 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 to 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.

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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 National College for Teaching and Leadership (NCTL).

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

Timescales

Any investigation into an allegation of abuse will be carried out in line with the Trust disciplinary procedure.

Specific actions

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

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

- **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

- **Unsubstantiated, 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 needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate. If an allegation is 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. Parents will be asked to sign a confidentiality agreement.
- 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 and decisions reached (and justification for these, as stated above).
- 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 proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.
- include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

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

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

Non-recent allegations

Abuse can be reported no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

6.2 Concerns that do not meet the harm threshold, including low-level concerns

This section applies to all low-level concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out 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. We will create this culture by:

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

Responding to low-level concerns

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

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

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy.

Record keeping

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

Records will be:

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

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

References

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

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

Section 7: Management of the policy

This policy will be reviewed and approved by Governors at least annually, and updated as necessary following new guidance.

All members of staff are required to read this policy at least annually, and any newly-updated sections as necessary.

This policy will be available for parents and carers to access on the website, and in paper form as required. A paper copy can be obtained from the office.

The DSL will complete the Annual Safeguarding Report for Headteachers annually. This will be shared with the Governor for Safeguarding. Any required actions identified through this will be shared with the Governing Body.