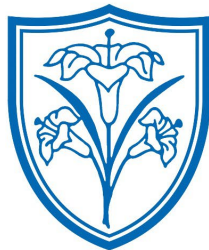


ST MARGARET'S PREP



ST MARY'S CALNE

& ST MARY'S SPORTS CLUB

### **Safeguarding and Child Protection Policy**

(incorporating Child on Child Abuse)

Issued by:	SGT
Last review:	September 2024
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Location:	Website School Portal MSP

## Safeguarding and Child Protection Policy

St Mary's Calne and St Margaret's Prep fully recognises their responsibilities for safeguarding and child protection. This is a whole school policy that includes the EYFS.

### Key Safeguarding Personnel St Mary's Calne

Role	Staff	Email	Telephone
<b>Designated Safeguarding Lead (DSL)</b> Designated Teacher for looked After Children and Young Carers (St Mary's) PREVENT Single point of contact	Mrs Sophie Toland Deputy Head Pastoral, SLT	<a href="mailto:stoland@stmaryscalne.org">stoland@stmaryscalne.org</a>	01249 857305
Head	Anne Wakefield Head	<a href="mailto:head@stmaryscalne.org">head@stmaryscalne.org</a>	01249 857205
Deputy Designated Safeguarding Lead (DDSL)	Diana Harrison Senior Deputy Head	<a href="mailto:dharrison@stmaryscalne.org">dharrison@stmaryscalne.org</a>	01249 857 377
Deputy Designated Safeguarding Lead (DDSL)	Mrs Claire Bolton Head of Community Outreach, WSLT	<a href="mailto:cbolton@stmaryscalne.org">cbolton@stmaryscalne.org</a>	01249 857316
Deputy Designated Safeguarding Lead (DDSL)	Mrs Vicky Firth Housemistress and Teacher of Biology	<a href="mailto:vfirth@stmaryscalne.org">vfirth@stmaryscalne.org</a>	01249 857309
Nominated Governor for Safeguarding	Mrs Tricia Pearce	Via the clerk to the Governors <a href="mailto:bursar@stmaryscalne.org">bursar@stmaryscalne.org</a>	01249 857301
Chair of Governors	Mr Svante Adde	Via the clerk to the Governors <a href="mailto:bursar@stmaryscalne.org">bursar@stmaryscalne.org</a>	01249 857301

### Key Safeguarding Personnel St Margaret's Prep

<b>Designated Safeguarding Lead (DSL)</b> Designated Teacher for looked After Children (St Margaret's)	Juliette Heal Deputy Head	<a href="mailto:healj@stmargaretsprep.org.uk">healj@stmargaretsprep.org.uk</a>	01249 857220
Head	Anne Wakefield Head	<a href="mailto:head@stmaryscalne.org">head@stmaryscalne.org</a>	01249 857205
Deputy Designated Safeguarding Lead (DDSL)	Alex Hopkins Prep School Head	<a href="mailto:prephead@stmargaretsprep.org.uk">prephead@stmargaretsprep.org.uk</a>	01249 857 220

#### Children's Social Care referrals:

Integrated Front Door (IFD): 0300 456 0108

Out of hours: 0300 456 0100

#### Local Authority Designated Officer (LADO):

0300 456 0108 (option 6) or [lado@wiltshire.gov.uk](mailto:lado@wiltshire.gov.uk)

#### Early Help Single Point of Entry:

0300 456 0108

#### Radicalisation and Extremism Contacts:

Local Prevent Team: [PreventSW@avonandsomerset.police.uk](mailto:PreventSW@avonandsomerset.police.uk) or 01278 647466

Local Police Force 101

DfE non-emergency advice for extremism: 0207 3407264

or [counter-extremism@education.gov.uk](mailto:counter-extremism@education.gov.uk)

If you believe a child is at immediate risk of significant harm or injury, or if a crime has been committed, you must call the police on 999.

This policy should be read alongside the following other school policies and guidance:

- *Behaviour Policy*
- *Anti-bullying and anti-cyber bullying policy; transgender and homophobic bullying*
- *Emergency Plan*
- *Staff Code of Conduct*
- *Equal Opportunities*
- *Self-Harm*
- *Data Protection Policy*
- *Guidance on relationships at school*
- *Wellbeing and Positive Mental Health*
- *RSE Policy*
- *Recruitment Policy*
- *Whistleblowing Policy*
- *SEND Policy*
- *Missing Pupil Policy*
- *School IT Policies including the Online Safety Policy*
- *DfE The Prevent Duty (June 2015) (Revised Prevent duty guidance: for England and Wales -April 2021)*

In addition, all staff will have read and understood Part 1 or Annex A of the latest version of *Keeping Children Safe in Education*, (KCSIE). School leaders and staff who work directly with children will have also read Annex B and Part 5.

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## What is safeguarding?

Safeguarding children is defined as:

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

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a whole-school preventative approach to keeping children safe, including online that incorporates pupil health and safety; school behaviour management and preventing Child on Child abuse; supporting pupils with medical conditions; Relationships, Sex and Health (RSHE) education and Personal, Social, Health and Economic (PSHE) education; providing first aid and site security. **Safeguarding is the responsibility of all adults**, especially those working or volunteering with children. The school aims to help protect the children in its care by working consistently and appropriately with all relevant agencies to reduce risk and promote the welfare of children.

Staff:

- are advised to maintain an attitude of 'it could happen here' as far as safeguarding is concerned.
- should always act in the best interest of the child.
- are familiar with this safeguarding policy and have an opportunity to contribute to its review.
- are alert to signs and indicators of possible abuse and wider safeguarding issues.
- are aware of the importance of professional curiosity
- are able to record and report concerns as set out in this policy.
- are able to deal with a disclosure of abuse from a child.
- are involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

## What is safeguarding?

Safeguarding and promoting pupil welfare is 'everyone's responsibility' and is defined as: ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes; providing help and support to meet the needs of children as soon as problems emerge • protecting children from maltreatment, inside or outside the home, including online; preventing the impairment of children's health, mental health or development.

## What is child protection?

Child protection is a part of safeguarding and promoting welfare. This refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

## 1. INTRODUCTION

St Mary's Calne and St Margaret's Prep fully recognises their responsibilities for safeguarding and child protection. We facilitate a whole school approach and are dedicated to safeguarding and promoting the welfare of our pupils, regardless of sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation. We follow the child protection procedures set out by Wiltshire's "Safeguarding Vulnerable People Partnership". We understand the need to engage with the Safeguarding Vulnerable People Partnership and the statutory duty to cooperate if the school is named as a relevant agency. We have regard to statutory guidance issued by the Department for Education *Keeping Children Safe in Education, 2024* and are aware of our obligations under the *Human Rights Act 1998* and *Equality Act 2010*., Our policy takes full regard to *Working Together to Safeguard Children 2024 (WT)*, *What to do if you are Worried a Child is Being Abused (2015)* and the *National Minimum Boarding Standards (2022)*.

At St Mary's and St Margaret's we have a 'Nominated Governor' to take leadership responsibility for the school's safeguarding arrangements.

**The role of the Nominated Governor is outlined in Appendix 1.**

The Governing body has appointed a senior member of staff from the school's leadership team to the role of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) for child protection and safeguarding. The D/DSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

During term time, the D/DSL are always available for staff in the school to discuss any safeguarding concerns.

**The role of the DSL is outlined in Appendix 2.**

## **2. SAFEGUARDING INFORMATION FOR PUPILS**

- All pupils in the schools are aware of staff who they can talk to, for example, their Class Teacher, House Staff, Tutor, Deputy Head Pastoral, School Counsellor and Independent Person and outside agencies (details are on the pupil support poster displayed in Houses).
- Pupils are taught at age-appropriate stages about safeguarding, including online safety and are provided with appropriate programmes covering a range of topics to develop skills, concepts, attitudes and knowledge that promote their safety and wellbeing. St Mary's and St Margaret's recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed. The school considers this as part of providing a broad and balanced curriculum. This may include covering relevant issues for schools through Relationships and Sex Education, e.g. self-esteem, self-protection, boundaries between appropriate and inappropriate behaviour in adults and within their peer relationships.
- All staff and pupils sign the relevant IT Code of Conduct on entry to the school. For staff this is the "IT Code of Conduct Conditions" which is in section 11 of the Staff Code of Conduct.

## **3. WHAT CONSTITUTES CHILD ABUSE AND NEGLECT?**

All adults who work or volunteer with children should be able to identify concerns about child abuse and wider safeguarding issues, including risks outside the home and within the local area including online risks.

KCSIE 2024:

Abuse: 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.

**The main categories of abuse are:**

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Some specific Safeguarding issues are:

- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- So-called 'honour based' abuse, including Female Genital Mutilation (FGM) and Forced Marriage
- Preventing Radicalisation
- Children Absent from Education
- Child on Child abuse, including child on child sexual violence and sexual harassment
- Mental Health
- Serious Violence (see appendix 3)
- Domestic Abuse (see appendix 3)
- A Boarding school environment

This list is not exhaustive and further specific safeguarding issues are identified in KCSIE 2024.

For more information, including indicators, please refer to Appendix 3 of this document and KCSIE.

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

- Both CSE and CCE are forms of abuse (CSE is a form of sexual abuse) and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- this power imbalance can also be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
- In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.
- The abuse can be perpetrated by individuals or groups, males or females, and children or adults.
- Girls are at risk of CCE as well as boys, but their experience can be very different to boys.
- Young people being criminally exploited may be at a higher risk of sexual exploitation.
- The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- Victims can be exploited even when activity appears consensual. A child may believe they are in a genuine romantic relationship, and not realise they are being exploited.
- It should be noted exploitation as well as being physical can be facilitated and/or take place online.

### **Female Genital Mutilation (FGM)**

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.
- It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Whilst staff should speak to the DSL about any FGM concerns, there is a specific legal duty for teachers to inform the **police** if they discover that an act of FGM appears to have been carried out on a girl under the age of 18.

### **Forced Marriage**

- Forcing a person into marriage is a crime in England and Wales.

The Forced Marriage unit has published statutory guidance and Multi-agency guidelines (35-36 focus on Schools). School staff can contact the Unit for advice or information on 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Staff should not encourage students to follow or support specific political viewpoints. Both schools preclude the promotion of partisan political views. Staff should use their judgement in identifying children who might be at risk of radicalisation and speak to the DSL if they are concerned about a child. The DSL will act proportionately, which may include making a referral to the Channel programme or the IFD (Integrated Front Door).

### **Children Absent from Education**

The Schools understand that a child being absent from school for prolonged periods or on repeat occasions is a potential indicator of abuse and neglect.

Staff follow the Missing Pupil Policy in the first instance of a missing pupil. At St Margaret's, administrative staff follow up any absence and at St Mary's House staff and Tutors are responsible for following up any absences and flagging any concerns to the DSL. If a member of staff or volunteer at either school becomes aware that a child is absent from education, they need to report to the DSL immediately.

After reasonable attempts have been made to contact the family, we will follow the Safeguarding Vulnerable People Partnership procedure and refer to the IFD team.

If a looked after child or a child subjected to a CP plan goes absent, we will refer them to the IFD team within 48 hours.

Unauthorised absence procedures will be followed where a child or young person:

- has 10 days or more continuous absence from school without an explanation and/or
- has left school suddenly and the destination is unknown and/or
- has not taken up an allocated school place as expected.

Any such concern will be reported to the Local Authority through the Education Welfare Service: Karen Green: 01225 757902 or [karen.green@wiltshire.gov.uk](mailto:karen.green@wiltshire.gov.uk) and Pupilmove at [Pupilmove@wiltshire.gov.uk](mailto:Pupilmove@wiltshire.gov.uk) using a CME1 form. The school will also refer to the IFD any child being withdrawn from school with the intent to be electively home educated where there are safeguarding concerns.

For leavers who are moving to another school or to be home schooled Admissions will input the leaving data into ISAMS and once reports are finalised the database manager will convert the pupil to a "former pupil" on ISAMS. If appropriate, the safeguarding administrator then provides the local authority with the relevant form confirming the pupil has left.

### **Allegations Of Abuse Made Against Other Children: Child on Child Abuse**

St Mary's Calne and St Margaret's Prep have a zero-tolerance approach to abuse and will respond to all reports and concerns of child-on-child abuse (including those outside of school and/or online). We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that children are capable of abusing their peers (other pupils in the school setting or in another school) and girls are more likely to be victims and boys perpetrators, however girls can still be perpetrators. Staff are also aware that LGBT +children may be targeted. Abuse is abuse and will never be tolerated or passed off as "banter" or "part of growing up."

All staff are aware of the school's policy for child-on-child abuse and recognise the important role they have to prevent and respond to it. There is also recognition that abuse may be taking place even if no cases are reported.

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

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- gender based violence

- consensual and non-consensual sharing nudes and semi nudes images and/ or videos (also known as sexting or youth produced sexual imagery).
- Online abuse– can also take the form of abusive, harassing, misogynistic messages and sharing abusive images and pornography to those who do not wish to receive such content
- Sexual violence and sexual harassment between children (offline or online)– (See KSCIE Part 2 & 5 for more information)
- causing someone to engage in sexual activity without consent
- Upskirting (A criminal offence - taking a picture under a person's clothing without them knowing, for sexual gratification or to cause distress/humiliation to the victim)
- Initiation/hazing type violence and rituals

To minimise the risk of child-on-child abuse:

- Pupils at both schools follow a Pupil Code of Conduct (Annex 1 in the Behaviour Policy). This policy is in place indicating a variety of ways in which positive behaviours are encouraged along with Sanctions for inappropriate behaviours. The Anti-Bullying Policy and IT Policy clearly set out expectations for pupils.
- Both schools provide a relevant and effective curriculum, including PSHE and RSE helping pupils develop understanding of healthy relationships and keeping themselves safe.
- Pupils are aware of who they can speak to, for example, a trusted adult, and that they can report abuse to a member of staff: Pupil support posters suggest who to speak to and list helplines, including the NSPCC helpline number to support potential victims of sexual harassment and abuse in education settings (0800 136 663). Children at St Margaret's can access information via the EASY board.
- St Mary's pupils know they can also report any concern they have using an online reporting system which can be anonymous, and which will be treated seriously.
- Staff are trained so they understand that child on child abuse can happen here and are trained to be alert and report any behaviours that could cause concern. Staff are also trained to understand the further challenges of bullying and Child on Child Abuse within a boarding environment and how to respond to these
- St Mary's and St Margaret's have a clear procedure for staff to report all concerns and incidents to the D/DSL
- St Mary's and St Margaret's addresses any level of inappropriate behaviour as this may help prevent problematic, abusive and/or violent behaviour in the future.

Child-on-child abuse becomes a safeguarding concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm.

- Decisions on all child-on-child abuse will be made on a case-by-case basis and a risk assessment considered. (In cases of reports of sexual violence, a risk and needs assessment will be made immediately).
- The options will usually be:
  - to manage internally through policies and providing pastoral support to the victim and perpetrator, for example through the Class Teacher (SMP), House and Tutor system, Deputy Head Pastoral, School Counsellor, School Chaplain etc.
  - to offer early help to prevent escalation of harmful behaviours.
  - to refer to children's social care when a child has been harmed/is at risk of harm or in immediate danger. (If appropriate the school will make arrangements to protect a victim and other children in the school whilst an investigation occurs).
  - Report to the police (in parallel with reporting to social care). If a criminal offence has occurred (sexual assault etc.) the starting point is to pass to the police.
- A record will be made in line with advice from the record keeping section of this policy.
- For more information, please see the Anti-Bullying policy.

All staff, but especially the D/DSL should consider the context within which incidents/behaviours occur. Assessments of children should consider whether there are wider environmental factors that are a threat.



The Contextual Safeguarding Practice Lead for Wiltshire, Rachel Kay [rachel.kay@wiltshire.gov.uk](mailto:rachel.kay@wiltshire.gov.uk) is available to contact regarding incidents in the community.

### **Mental Health**

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 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.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy, and speaking to the DSL or Deputy DSL.
- More information can be found in the "Mental Health and Behaviour in School Guidance." Resources are also available at "Rise Above"

### **Boarding School Environment**

It is recognised that safeguarding in boarding school environments requires a multi-faceted approach, prioritising the safety and wellbeing of pupils at all times. St Mary's and St Margaret's adhere to the National Minimum Standards and the ISSRs to ensure pupils are protected from risk of harm.

All staff members, including those in boarding houses, receive thorough training on safeguarding principles, recognising potential risks, and reporting concerns. Staff are vigilant in supervising boarding house environments: this includes monitoring inter-personal relationships and being aware of potential risks such as child-on-child abuse, particularly in dormitories. Staff respect the privacy of boarders, particularly when visiting boarding houses and the school takes measures to reduce the risk of bullying and child-on-child abuse, such as moving boarders around regularly and emphasising the importance of respecting each other's space.

Boarders should feel comfortable and encouraged to talk to staff about any concerns or issues, and staff respond sensitively and confidentially. The school provides resources and support for boarders experiencing difficulties, including access to independent listeners or the Wellbeing Team.

Clear procedures for reporting safeguarding concerns to the Designated Safeguarding Lead (DSL) or other appropriate authorities are in place and pupils are made aware of these. Pupils can use the anonymous Report a Concern tool alongside other reporting mechanisms such as the School Parliament, suggestion boxes and House Councils.

Given the increasing use of social media and online platforms, the school monitors and addresses potential risks of online harm, intervening as required to ensure pupils are not at risk of harm.

## **4. PROCEDURE FOR STAFF TO REPORT A CONCERN ABOUT A CHILD**

All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This does not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. Both schools follow the procedure set out by the Safeguarding Vulnerable People Partnership 'What to do' flowchart (Appendix 4).

**Where any adult in the school has a concern about a child, they should:**

**Report the concern** to the D/DSL immediately by completing an Incident for the pupil using CPOMS (Child Protection Online Management System) to record the details of their concern. This must be recorded within 24hrs of the concern. The DSL/DDSLs will be alerted to the incident and if necessary, will advise on any action to be taken.

If the adult has **significant concerns** they should **also speak to the DSL/DDSL immediately** (or, a member of Senior Leadership Team in their absence). In their absence, they should speak directly to Children's Social Care (by contacting the IFD – see contact details at the beginning of this policy). Parental consent is not required, and anybody can make a referral to the IFD. In some circumstances, the DSL or member of staff will seek advice from Children's Social Care by ringing the IFD to obtain advice.

If you believe the child is at **immediate risk of significant harm or injury**, or that a crime has been committed, then you must **call the police on 999 immediately** and inform the DSL of your actions.

It is *not* the responsibility of school staff to investigate safeguarding concerns or determine the truth of any disclosure or allegation. All staff and volunteers, however, have a duty to recognise concerns and inform the DSL immediately.

Support staff that do not have access to CPOMS must speak to the D/DSL immediately about any concerns for a pupil. The D/DSL will advise how the member of staff should record the concern (e.g. Wiltshire concern form or CPOMS via the D/DSL but written, within 24hrs of the concern, by the member of staff to ensure it is a first-hand account).

A member of the SLT/ DSL team at both schools will always be available during school holidays. This is also the case for the St Margaret's Holiday Club.

The D/DSL will then decide on the best course of action and consider a referral to the IFD or Early Help (see section 15 for further information about Early Help).

Appendix 5 provides information about the actions taken by Children's Social Care when there are concerns about a child.

A "child in need" is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a "child is suffering, or is likely to suffer, significant harm" e.g. from abuse/neglect, FGM, CSE etc.

If a child's situation does not appear to be improving the staff member with concerns should press for re-consideration by following local escalation procedures.

## **5. RECORD KEEPING OF CHILD PROTECTION CONCERNS**

The school will:

- Keep clear written records of all child safeguarding and child protection concerns using the standard recording form, with a body map (see template in Appendix 6), including actions taken and outcomes as appropriate.
- Ensure all child safeguarding and child protection records are kept securely in a locked location. The record must be signed and dated and kept in a file under the child's name (not family files), away

from all the other records. The DSL is responsible for ensuring that concerns and discussions are written up properly and acted on appropriately.

- Ensure that all child protection records relating to a child who moves to another school or college are passed on to the new school securely, promptly and separate from the main pupil file, with a copy being kept in this school. Confirmation of receipt should be obtained. Child welfare records below the child protection threshold but with continuing relevance to the child's wellbeing should also be transferred with parental consent. Any safeguarding records for pupils are shared within 5 days of transfer or within 5 days of the start of a new term.

### **Information sharing – internal process**

Information concerning students at risk of harm will be shared with all members of staff on a “need to know” basis. The Designated Safeguarding Lead will make a judgement in each individual case about who needs and has a right to access particular information.

An overview sheet and chronology forms are provided (see Appendix 6).

## **6. RESPONDING TO DISCLOSURES: GUIDANCE FOR STAFF**

If a child wishes to confide in you the following guidelines should be adhered to:

### **Create a safe environment**

- Take the child to a private (but not isolated) safe place if possible
- Stay calm
- Reassure the child and stress that she is not to blame
- Tell the child that you know how difficult it must have been to confide in you
- Listen to the child and tell her that you believe them and are taking what is being said seriously
- If the child would prefer to write down their disclosure, allow them to do this instead
- Tell the child what you are going to do next after the disclosure
- Make accurate notes as soon as possible

### **Be honest**

- Do not make promises that you cannot keep
- Explain that you are likely to have to tell other people in order to stop what is happening

### **Be clear about what the child says and what you say**

- Do not interview the child and keep questions to a minimum.
- Encourage the child to use their own words and do not try to lead them into giving particular answers
- Questioning should only include TED questions:
  - Tell me
  - Explain
  - Describe
  - Or use the mirroring technique:  
i.e. “My dad hit me last night”; respond by “Your dad hit you last night?”

### **Do not take sole responsibility**

- **Immediately consult your Designated Safeguarding Lead** so that any appropriate action can be taken to protect the pupil if necessary.
- The Designated Safeguarding Lead will consider the information and decide on the next steps.

**Record on CPOMS (or a Wiltshire Concern form if advised to by the D/DSL)** exactly what the child has said to you as soon as possible and include the following:

- Date and time of any incident
- What the child said and what you said
- Your observations e.g. child's behaviour and emotional state

- The Child's name, address, date of birth are already on CPOMS so do not need recording on CPOMS.

#### **Maintain confidentiality**

- Tell only the DSL (or DDSL in their absence).

#### **Once a disclosure has been made**

- The child will be kept safe and offered a range of options according to the circumstances which may include, but not be restricted to: returning to class, taking time out in the Health Centre, speaking to a family member, etc.

#### **DO NOT:**

- Investigate the issue yourself or try to diagnose a condition.
- Ask the child to write down what they said or repeat it to another adult
- Record the conversation on any device
- Ask another adult to witness their disclosure –the child has chosen to tell you.
- Ever make the child feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment
- View or forward illegal images of a child (if the disclosure has an online element)
- Take images of a child's injury, bruising or similar

### **7. SHARING CONCERNS WITH PARENTS AND CARERS**

Both schools are committed to work in partnership with parents and carers and in most situations it may be appropriate to discuss initial concerns with them. For more information, please refer to *Information Sharing –Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018*.

However, there will be some circumstances where the DSL will not seek consent from the individual or her family or inform them that the information will be shared. For example, if doing so would:

- place a child at increased risk of significant harm;
- place an adult at increased risk of serious harm;
- prejudice the prevention, detection or prosecution of a serious crime;
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

In some circumstances, the Designated Safeguarding Lead will seek advice from Children's Social Care by ringing the IFD to obtain advice about the recommended course of action, which could include access to pastoral support and early help centres. This will be recorded on CPOMS.

The school shares a purpose with parents to educate, keep children safe from harm and have their welfare promoted.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information until we have permission, or it is necessary to do so to protect a child. The decision to share with parents would be recorded in writing.

Both schools will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm. Members of staff should be alert for signs of children who may be at risk due to domestic abuse.

We encourage parents to disclose any concerns they may have with St Mary's Calne. We make parents aware of our Child Protection Policy and parents are aware that this is on the school website

## **8. MANAGING ALLEGATIONS AGAINST ADULTS**

St Mary's Calne and St Margaret's Prep follow the procedure set out by the Safeguarding Vulnerable People Partnership 'Allegations against adults' flowchart (in Appendix 7). The flowchart is based on the SVPP's [Allegations Management Policy](#).

Where anyone in the school has a concern about the behaviour of an adult (including online behaviour) who works or volunteers at the school, they must immediately consult the Head who, if the allegation meets the threshold, will refer to the Local Authority Designated Officer (LADO) details at the front of this policy. (For open cases please contact CSGTEAMNORTHADMIN@wiltshire.gov.uk).

The threshold may be met when anyone working in at either school including supply teachers, volunteers and contractors (and any external organisation/individual using the schools' premises) has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If the allegation involves a member of the SMC Tennis Academy staff (and therefore member of LTA), the Head will inform the LADO so LADO can contact the LTA (Lawn Tennis Association) directly or advise if the Head should complete a LTA digital concern form: <https://safeguardingconcern.lta.org.uk>

Any concern or allegation against the Head will be reported to the Chair of Governors without informing the Head.

Any allegation of abuse will be dealt with promptly in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. In some circumstances the member of staff will, without prejudice, be asked to take a period of paid leave pending the results of the investigation. If the member of staff lives in staff accommodation, alternative arrangements would be made for him or her away from children during the period of investigation.

St Mary's Calne and St Margaret's Prep will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Malicious allegations against staff will be investigated and dealt with by the Head and, if appropriate, a committee of governors.

Reports to the Head regarding supply staff and contractors will also be notified to their employers. Staff may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of a child is paramount.

### **Low Level Concerns**

St Mary's and St Margaret's Prep operate a 'low-level' concerns policy in accordance with KCSIE 2024. 'Low-level' refers to behaviour that is: inconsistent with expectations set out in the Staff Code of Conduct, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns will be reported to the Head, or in her absence, the Senior Deputy Head; low-level concerns about the Head will be reported to the chair of governors.

Examples of low-level concerns:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils.

The school will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Code of Conduct), and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- encourage staff to share any low-level safeguarding concerns;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and support the individual to correct it at an early stage. If the concern has been raised via a third party, the Head or Senior Deputy Head will collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously;
  - to the individual involved and any witnesses.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Low level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Any low-level concerns shared about any supply staff and contractors will be notified to their employers.

## **9. WHISTLEBLOWING**

Whilst the 'allegation management' procedure described above must be used when the behaviour of an adult causes a concern, all staff, volunteers and pupils should also feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime (or whistleblowing). Please refer to the school's Whistleblowing Policy in the Resources channel in the Staffroom Team. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the Head or Senior Deputy Head of St Mary's, the Head of St Margaret's or the Bursar.

Where a staff member feels unable to raise an issue with those identified above or feels that their genuine concerns are not being addressed, they have a right to raise it in confidence with the Governors.

In addition, the NSPCC's whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday, Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Visit <https://www.nspcc.org.uk/what-you-can-do/report-abuse/> to report abuse using an online form.

Pupils are able to raise concerns anonymously using the "Report a Concern" Microsoft Form

## **10. STAFF SAFEGUARDING TRAINING**

St Mary's Calne and St Margaret's ensure that all staff members undergo safeguarding and child protection training at induction.

- All staff - including temporary staff, volunteers and governors - are provided with the Child Protection Policy, Anti-Bullying Policy and Staff Code of Conduct. The Child Protection Policy includes the Children Missing in Education policy, which is discussed in the induction meeting with the D/DSL.
- All staff – including temporary staff and volunteers – also receive a copy of KCSIE (2024) Part 1 (or Annex A if more relevant) to read and understand in the context of a school. . All staff complete an on-line e-learning module to support this understanding as well as e-modules on safeguarding, radicalisation and e-safety which includes information on filtering and monitoring.
- All staff – including temporary staff and volunteers have an induction meeting with the DSL or DDSL
- The whole school staff group receives safeguarding training at least every three years with annual up-dates and notifications of any necessary changes, reminders being made available as required via staff meetings/e-mails/bulletins.
- The D/DSL attend safeguarding training at least once every two years, attends safeguarding forums and keeps up to date with recommendations from serious case reviews, changes to national and Safeguarding Vulnerable People Partnership policy and guidance.
- The D/DSL stays up to date with the Prevent duty.
- The D/DSL also completes additional online safety training.

## **11. SAFER RECRUITMENT**

- St Mary's Calne and St Margaret's follows the guidance in KCSIE (2024) Part 3.
- The Recruitment Policy is based on safer recruitment practices which are always followed.
- The school carries out several pre-employment checks when recruiting new staff and selecting volunteers. These include Enhanced DBS check with barred list information, identity checks (which also confirm right to work in the UK), verification of mental and physical fitness, their qualifications (cited on application forms) checked (against original certificates), a minimum of two employment references, gained before interview where possible (verified by telephone), overseas checks where relevant and teachers are checked for Prohibition Orders (issued by the Teaching Regulation Authority, (TRA)) on all appointments made since 1<sup>st</sup> April 2012. From January 2021, as the TRA no longer maintain a list of EEA checks, all EEA teachers will be checked in line with KCSIE's latest guidance. St Mary's and St Margaret's may carry out an online search as part of their due diligence on the shortlisted candidates. This will be made clear on the application form.
- At least one member of staff on an interview panel has safer recruitment training which is updated regularly (at least every three years). All recruitment processes involve a separate Safer Recruitment interview conducted by a trained member of staff.
- All checks are accurately recorded on a single central record.
- Volunteers (where relevant) will have DBS checks, references, an informal interview, discussion about safeguarding policy before appointment, induction and training.
- Governors will have Enhanced DBS checks, a discussion about safeguarding policy, induction and training, (as in KCSIE (2024) and Safeguarding Vulnerable People Partnership guidance). In addition, the revised standards require that checks be made for the existence of directions made by the Secretary of State under section 128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an independent school.
- The scope of the barring direction includes members of the governing body and all staff positions as follows: headteacher, any teaching positions on the Senior Leadership Team and any teaching positions which carry a departmental headship (the Bursar will also be subject to these checks).
- The school commits to report promptly to the DBS any person (whether employed, contracted, student or a volunteer) whose services are no longer used for regulated activity and the DBS

referral criteria are met, that is, he or she has caused harm or posed a risk of harm to the child. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. The school will also consider making a referral to the Secretary of State (via the Teaching Regulation Agency (TRA)) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and where a prohibition order may be appropriate. Dismissal might be due to 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

## **12. SAFER WORKING PRACTICE**

This policy should be read in conjunction with the Staff Code of Conduct, provided with the contract of employment, which must be read, signed and understood.

## **13. MOBILE TECHNOLOGY, PHOTOGRAPHY AND IMAGES**

Digital technologies are powerful tools which open up new educational and recreational opportunities for everyone. The use of the latest technology is actively encouraged at both schools, but this comes with a responsibility to protect pupils, staff and the school from abuse of the system.

**Under no circumstances should staff be expected or allowed to use their personal equipment to take images of pupils at or on behalf of the school or setting.**

Staff and volunteers *should*:

- Adhere to Staff IT Code of Conduct (section 11 of Staff Code of Conduct) and Data Protection Policy.
- Only use school equipment
- Only take photos or videos of pupils to celebrate achievement or aid learning
- Ensure that pupils are appropriately dressed
- Encourage pupils to tell us if they are worried about any photographs that are taken of them
- Only retain images when there is a clear and agreed purpose for doing so
- Store images in an appropriate secure place in the school

Staff and volunteers *should not*:

- Take images/recordings in one-to-one situations
- Take images/recordings of pupils for their personal use
- Take images/recordings on personal equipment,
- Take images/recordings of pupils in a state of undress or semi undress or take images/recordings which could be considered indecent or sexual.

Photographs of pupils at St Mary's and St Margaret's may be taken for commercial purposes; as part of an assessment process; to showcase children's talents and achievements and document the life of the school.

For more information, please see the school's Staff IT Code of Conduct (section 11 of Staff Code of Conduct) and the Data Protection Policy

For more information regarding the use of mobile devices in the EYFS, please see the school's Use of Mobile Devices Policy in the EYFS.

## **14. INTERNET SAFETY MEASURES**



- The school will ensure that appropriate filtering and monitoring systems are in place to prevent staff and pupils from accessing unsuitable or illegal content. The school uses Bitdefender anti-virus software, Smoothwall for website and email filtering, and our internet provider, Oakford's firewall. This software is installed on to the student BYOD and filters any harmful content.
- Any online home learning is completed on Microsoft Teams which has the same filtering and monitoring systems as those in school for text-based communications. During remote learning, St Mary's and St Margaret's ensure that parents and carers are made aware of what their children are being asked to do online, including sites they will be asked to access and be clear who from the school (if anyone) their child will be interacting with online.
- The school will take all reasonable precautions to ensure that users access only appropriate material.
- Logs of filtering change controls and of filtering incidents will be made available to staff at both schools as follows:
  - The Head.
  - The Designated Safeguarding Lead.
  - A Deputy Designated Safeguarding Lead.

These filtering logs are checked daily, and any concerns are recorded and followed up on CPOMS. The Online Safety Group meet regularly and use the self-review "360 Safe" tool. For more information, please refer to the Online Safety Policy.

## **15. 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 and has specific additional needs;
- has a mental health need;
- has special educational needs (whether or not they have a statutory education, and care plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation.
- is at risk of being radicalised or exploited;
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is at risk of an "honour"-based abuse such as FGM or Forced Marriage;
- is showing early signs of abuse and/or neglect;
- is a privately fostered child
- is persistently absent from education, including for parts of the school day

Whenever possible, we will ensure that early intervention is actioned via a referral to Early Help as soon as the criteria are met, to prevent situations from escalating into larger problems.

Therefore, the school will consider the following:

- Undertake an assessment of the need for early help;
- Provide early help services e.g., Deputy Head Pastoral, Wellbeing Team House and Tutor systems, School Nurse, SENCO;

- Refer to appropriate services e.g., CAMHS etc.

The DSL will generally lead on setting up an assessment, but staff may be required to act as the lead professional and support other agencies/professionals in an early help assessment. Cases should be kept under constant review and consideration given to referral for a social care assessment if the child's situation does not improve.

More information on early help is found in St Mary's Early Help Offer and the [Wiltshire Safeguarding Thresholds Guidance](#) document which supports schools and other agencies about the suitable action to take when a child has been identified as making inadequate progress or having an unmet need.

## **16. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS OR DISABILITIES (SEND) AND LOOKED AFTER CHILDREN**

The school recognises that for a variety of reasons, children with additional needs face an increased risk of abuse and neglect; therefore, adults are expected to take extra care to interpret correctly apparent signs of abuse or neglect. Indications of abuse will be reported as for other pupils.

Additional barriers can exist when recognising abuse and neglect in children with SEND. This can include:

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

We will provide a school environment in which pupils with SEND feel confident and able to discuss their concerns. Extra pastoral support will be considered for pupils with SEND and whenever possible, pupils will be given the chance to express themselves to a member of staff with appropriate communication skills. The DSL will work with the Head of Learning Support to identify pupils with particular communication needs.

Wiltshire Council provides targeted support services for children with SEND who need additional support: **SEND Service: 01225 757 985.**

Should a Looked After Child be registered at St Mary's or St Margaret's we would contact the **Wiltshire Virtual School** based in Melksham on 01225 771679 or email at [virtualschool@wiltshire.gov.uk](mailto:virtualschool@wiltshire.gov.uk) and liaise with the Virtual School Head for advice. We recognise that a previously looked after child potentially remains vulnerable and may need extra support to keep them safe.

### **16. 1 Children who need a social worker (Child in Need and Child Protection Plans)**

- Children may need a social worker due to safeguarding or welfare needs.
- Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
- Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and

about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **16.2 Children requiring mental health support**

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- The schools ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

## **17. WELCOMING OTHER PROFESSIONALS**

Visitors with a professional role will have had the appropriate vetting checks undertaken by their own organisation. They should provide evidence of their professional role and employment details (an identity badge for example). If necessary, the school will contact the relevant organisation to verify the individual's identity.

Professionals will complete signing in/out forms and wear a school I.D. badge.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. They are also required to complete a Visiting Speaker Agreement form, which is circulated to Houses at St Mary's and staff at St Margaret's with any sensitive topics due to be covered prior to the event.

## **18. SITE SAFETY / OFF-SITE VISITS**

### **Site Safety**

Risk Assessments are undertaken and maintained in accordance with the school's health and safety policy.

St Mary's and St Margaret's will seek assurance from another body using the school premises that they have appropriate safeguarding and child protection policies in place, where appropriate, regardless of whether or not the children attending are the school's pupils.

### **Off-Site Visits**

Appropriate risk assessments must be in place prior to any off-site visit taking place including staff/pupil ratios.

Any overnight visit will explicitly set out:

- sleeping arrangements;
- the role and responsibility of each adult, whether employed or volunteers
- on/off duty arrangements
- clear expectations about boundaries and interactions with children;
- expectations that there will be no smoking/drinking by adults

Safeguarding concerns or allegations should follow the procedure described above. The member of staff in charge of the visit will report any safeguarding concerns to the DSL and/or Head, who will make a referral to the IFD or Local Authority Designated Officer (LADO) if appropriate.

**In an emergency, the staff member in charge will contact the police and/or the IFD.**

## **19. EXCHANGE VISITS**

As a school we will satisfy ourselves that parents/carers who will act as host families for pupils are suitable to host pupils and are aware who in the school, they should raise any concerns with. All adults in the host

family will be subject to DBS checks in line with KCSiE (2024) guidance. The school will carry out risk assessments for 16–17-year-olds in the household to assess if a DBS check is required.

We will work with partner schools abroad to establish a shared understanding of, and agreement to the arrangements in place for the visit. We will use our professional judgement to ensure the arrangements are appropriate and sufficient to safeguard every child taking part in the exchange. (KCSiE 2024, Annex D).

## **20. LETTINGS**

Schools are required by KCSiE 2024 to ensure that organisations and individuals that hire/rent the premises have ‘appropriate arrangements’ to keep children safe when using the school premises for non-school activities. This includes requesting and scrutinising providers’ safeguarding and child protection policies and procedures, ensuring liaison with the provider regarding safeguarding matters regardless of whether any children accessing the provision are on the school roll. Following the schools’ protocols are a condition of the use/occupation of the premises by the provider and failure to comply will lead to termination of the agreement.

Further information regarding the schools’ protocol can be found below:

 [Outdoor Facilities Hire Safeguarding Protocol 04.01.2024.docx](#)

Staff should also refer to the schools’ Lettings Policy.

## **21. POLICY REVIEW**

The Governing Body will undertake an annual review of the school’s Child Protection Policy and procedures and remedy any deficiencies and weakness found without delay.

## Appendix 1:

### **The role of the Nominated Governor**

Schools should appoint a Nominated Governor (NG) for safeguarding (or equivalent) to take leadership responsibility for the organisation's safeguarding arrangements.

This person's role is to ensure safeguarding is always a priority by:

- Championing child protection issues within the school and liaising with the DSL and the Head and offering challenge if necessary
- Ensuring the Child Protection policy is checked for impact and reviewed yearly accordingly
- Auditing safeguarding measures annually alongside the DSL and the Head using the Wiltshire Council annual school safeguarding audit return and reporting back to Full Governing Body
- Ensuring that all governors understand and comply with their statutory duty to provide the services of the school in a way that safeguards and promotes the welfare of pupils.

## **Appendix 2:**

### **The Role of the Designated Safeguarding Lead (DSL)**

The Governing body committee should ensure an appropriate senior member of staff, from the Senior Leadership Team, is appointed to the role of Designated Safeguarding Lead (DSL). The DSL should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

#### **Deputy Designated Safeguarding Leads**

Any deputies (DDSLs) should be trained to the same standard as the DSL. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection as set out above, remains with the DSL, this lead responsibility should not be delegated.

#### **Manage referrals**

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required.

#### **Working With others**

The DSL is expected to:

- Act as a source of support, advice and expertise for staff
- Act as a point of contact with Wiltshire's Safeguarding Vulnerable People Partnership
- Liaise with the Head to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and SENCOs or the named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Liaise with the Senior Mental Health Lead and, where available, the Mental Health Support Team where safeguarding concerns are linked to mental health
- Promote supportive engagement with parent and/or carer in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting education outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing or have experienced, and identifying the impact that these

issues might be having on children's attendance, engagement and achievement at school or college. This includes:

- Ensure the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintain a culture of high aspirations for this cohort;  
And
- Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care interventions have ended, there is still a lasting impact on children's education outcomes.

### **Undertake training**

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via ebulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the School's Child Protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- understand relevant data protection legislation and regulations, especially the Data protection Act 2018 and General Data Protection Regulation.
- Understand the importance of information sharing, both within the School and with Wiltshire's Safeguarding Vulnerable People Partnership, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should 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.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college 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. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raise Awareness**

- The DSL should ensure the School's Child Protection policies are known understood and used appropriately.
- Ensure the School's Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- Link with Wiltshire Safeguarding Vulnerable People Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote education outcomes by sharing information about the welfare, safeguarding and child protection issues that children who have or have had a social works are experiencing with teachers and school leadership staff.

### **Availability**

During term time, working hours the DSL (DDSL) should always be available for staff in the School to discuss any safeguarding concerns. Out of hours/Out of term activities contact is via phone to one of the DSL or Deputies



## Appendix 3:

### Definitions and Indicators of abuse and neglect

*What to do if you are worried a child is being abused* 2015 and KCSIE 2024 provide definitions and indicators of the categories of abuse and neglect. Some of the signs below *may* be indicative of abuse:

#### Physical Abuse:

##### Definition:

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.

##### Indicators:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained:
  - bruises or cuts;
  - burns or scalds; or
  - bite marks.

Physical abuse can also occur outside of the family environment.

#### Emotional Abuse:

##### Definition:

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.

##### Indicators

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- 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.

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

## Definitions and Indicators of abuse and neglect continued:

### Sexual Abuse:

#### Definition:

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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

#### Indicators:

- 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.

You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such.

A child may not understand what is happening and may not even understand that it is wrong.

### Neglect:

#### Definition:

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.

#### Indicators:

- 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.
- Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Children who are neglected often also suffer from other types of abuse.

Neglect may occur if a parent becomes physically or mentally unable to care for a child.

A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

**Specific safeguarding issues and potential indicators:** KCSIE (2024), Annex A & B provide definitions and indicators of specific safeguarding issues. Examples of some safeguarding issues and potential indicators are below:

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation**

Forms of abuse (CSE is a form of Sexual Abuse) and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

The following could be indicators of CSE and CCE

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education.

The following could be indicators of CSE

- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant;

### **So-called "Honour-Based Abuse"**

#### **Female Genital Mutilation (FGM):**

##### **Indicators that a child or young person may be at risk of FGM:**

- Knowing that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school;
- The child may also talk about a special procedure/ceremony that is going to take place or a special occasion to 'become a woman'.

*Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.*

##### **Indicators that FGM may already have occurred:**

- Prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems;
- Difficulty walking, sitting or standing, and look uncomfortable;
- Spend longer than normal in the bathroom or toilet;
- May complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about.

#### **Forced Marriage**

##### **Common warning signs:**

- The young person suddenly becomes more withdrawn, spends less time with friends than they used to and then doesn't answer calls or texts
- Often victims of forced marriage are subjected to violence to pressurise them into it, so you may notice bruising, possibly on their upper arms. But in most cases the pressure is emotional, so it is harder to detect
- If someone you think is at risk suddenly goes away on holiday without warning, especially in the summer, this could indicate they are in danger
- If someone has siblings who were forced to marry – or even just married young – this can be an indication they are at risk
- If an older child refuses to marry, this can increase the pressure on younger siblings (especially girls) in order to uphold the family honour

## Specific safeguarding issues and potential indicators continued:

### Serious Violence/County Lines

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. Indicators may include:

- being male
- frequent absence or excluded from school
- having experienced child maltreatment
- involved in offending, such as theft or robbery
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or significant change in well-being
- signs of assault or unexplained injuries
- unexplained gifts or new possessions can also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- More advice can be found at [advice to schools on gangs and youth violence](#) and [County Lines](#)

### Preventing Radicalisation:

Extremism can take several forms, including Islamist extremism and far-right extremism.

**Radicalisation** is the process by which a person comes to support terrorism and forms of extremism.

- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.
- Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.
- The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Terrorism – an action that endangers or causes serious violence to a person/ people; damage to a property or seriously interferes with an electronic system. The threat is designed to influence government or intimidate the public and is made to advance political, religious or ideological cause.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Radicalisation of young people can be compared to grooming for sexual exploitation.

#### Early indicators may include:

- Vulnerability and social factors, such as:
  - family or local community tensions
  - low self-esteem
  - experience of poverty, disadvantage, discrimination, social exclusion / perception of injustice
- Access to extremist influences or showing sympathy for extremist causes
- Advocating messages similar to illegal organisations
- Evidence of accessing / possessing illegal or extremist material (including online)
- Justifying the use of violence to solve societal issues
- Pattern of regular or extended travel to locations known to be associated with extremism
- Significant changes to appearance, behaviour and peer relationships.

Specific safeguarding issues and potential indicators continued:

### **Private Fostering**

Under certain conditions, a child might be cared for, as part of a private arrangement, by someone who is not their parent or a 'close relative'. This constitutes private fostering when the following conditions are met:

- a child is under 16 years of age – 18 if they have a disability
- the arrangement is for 28 days or longer
- the child's new carer does not have parental responsibility for the child and is not a close relative.

Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

By law parents and carers must notify the local authority of private fostering arrangements to safeguard and protect the child's welfare as well as ensuring the child, carer and parent are receiving appropriate support and help.

As a school, if we do become aware that a child or young person is being privately fostered, we will inform the carer/parent of their legal duty to notify Wiltshire Children's Social Care; we will follow this up by contacting Children's Social Care directly.

### **Mental Health**

Mental health concerns can also be indicators that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

More information can be found in the <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>,

### **Domestic Abuse**

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

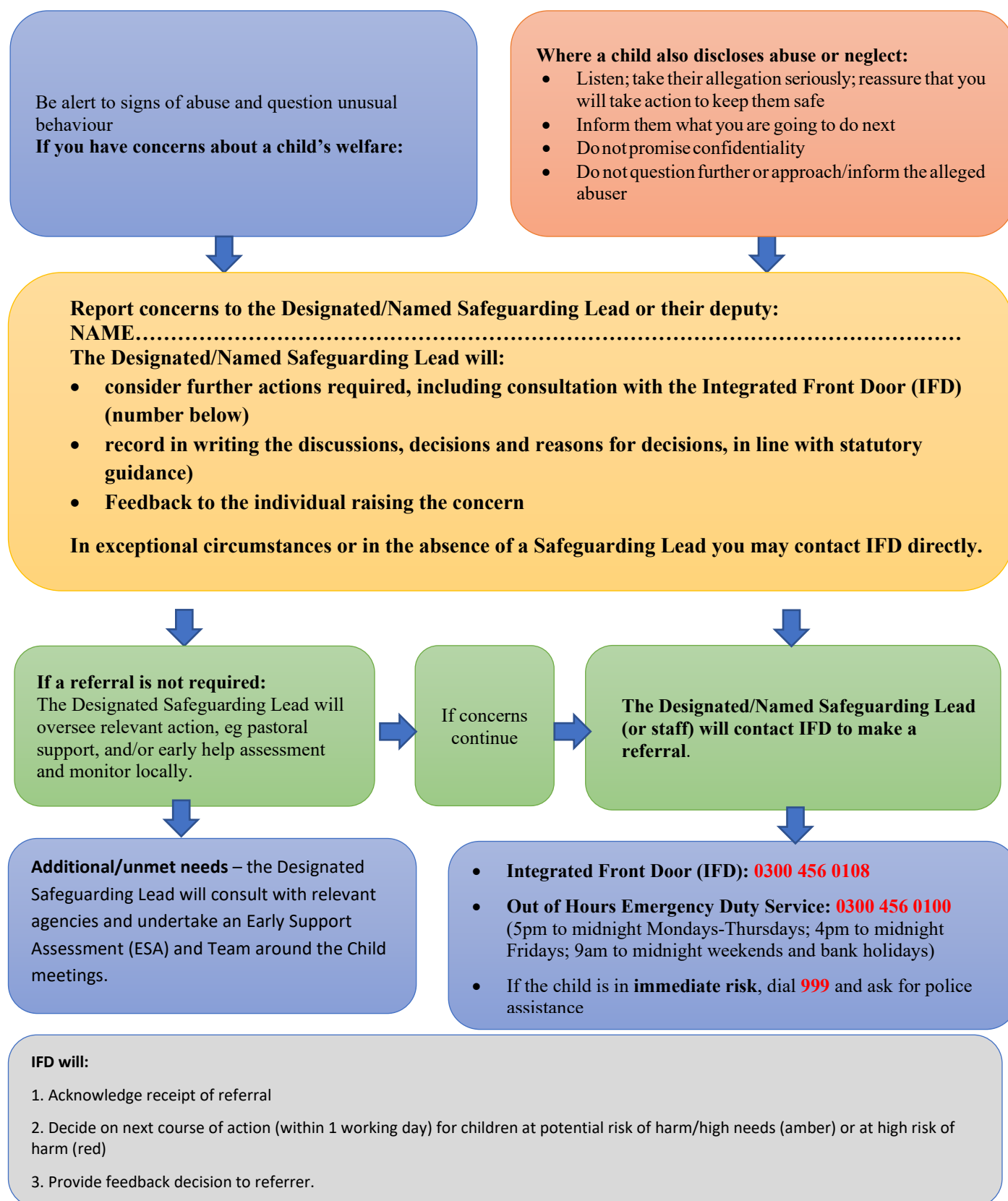
Helpline for staff at educational settings open 8am – 1pm 0204 513 9990 (charged at local rate).

## Appendix 4:

Safeguarding Vulnerable People Partnership flowchart 'What to do if you're worried a child is being abused/neglected'

### What to do if you are worried a child is being abused, neglected or exploited

For staff, volunteers and visitors in all agencies and settings



This flowchart is intended for use as a brief guide. Refer to the Wiltshire SVPP 'Multi-Agency Threshold guidance' and the DfE Guidance 'What to do if you are worried a child is being abused' for more information, definitions and possible indicators of abuse.

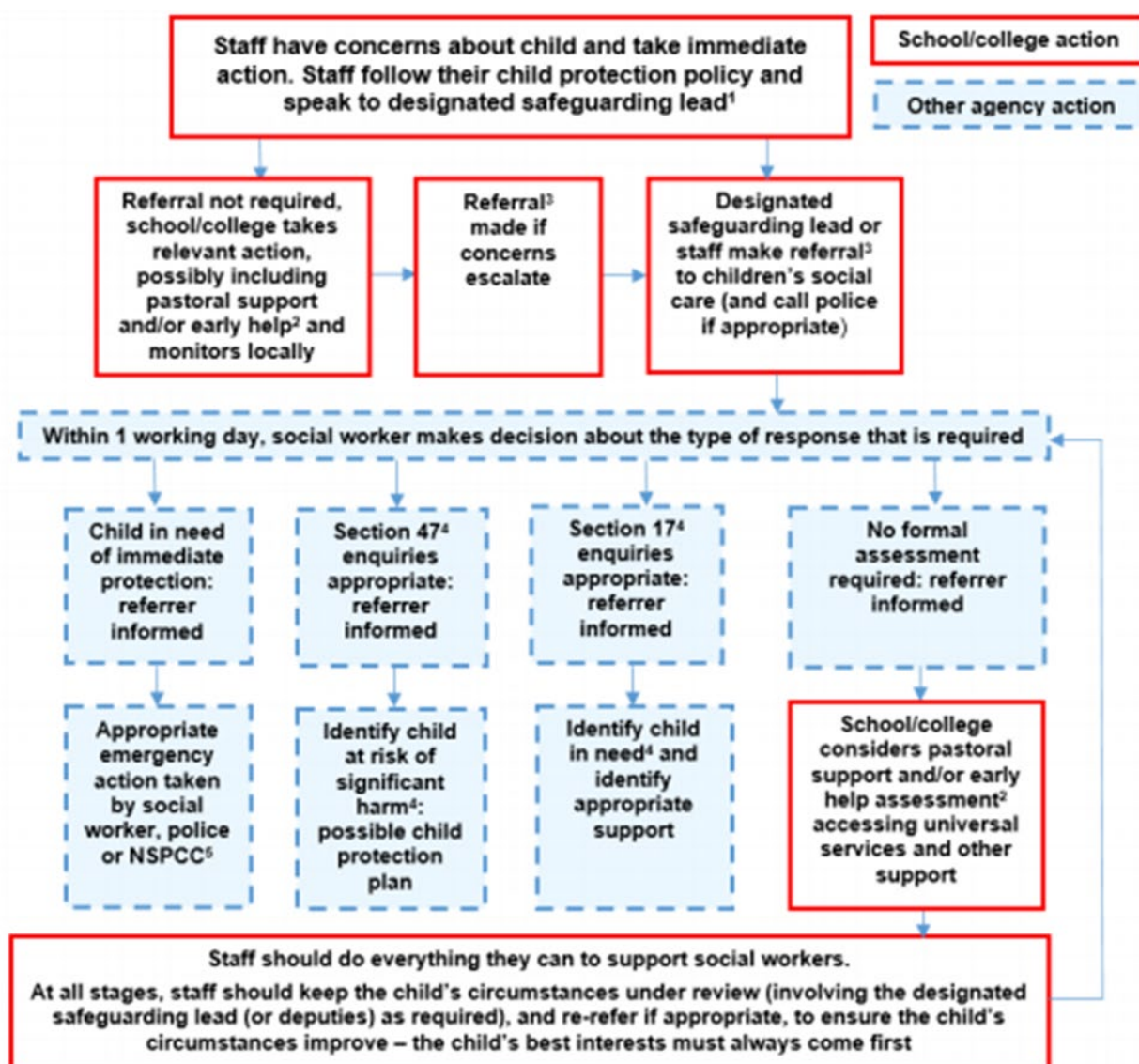
SVPP website: [www.wiltshiresvpp.org.uk](http://www.wiltshiresvpp.org.uk)

Reviewed: September 2024

## Appendix 5:

### Actions where there are concerns about a child

Diagram below is an extract from KCSIE (2024)



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Appendix 6:

### Safeguarding Vulnerable People Partnership Welfare and Child Protection concern form

#### Concern Form Part A

- **Part A** is to be completed by the adult who first has a concern and reported to the Designated Safeguarding Lead (DSL) without delay.  
Separate concern forms should be completed for both alleged instigator(s) and victim(s) of incidents.
- **Part B** is to be completed by the DSL

Child's name			
Date of birth <small>This may be added by the DSL having ensured there is no risk of confusion if children have similar names</small>			
Name of member of staff/person reporting the concern	PLEASE PRINT		
	Signature		
Role			
Date DD/MM/YYYY		Time	

Concern(s) - Use the body- map show any marks or injuries.		
Additional form used?	Yes / No	Page of





**Concern Form Part B**

To be completed by the Designated Safeguarding Lead (D/DSL)

Name of D/DSL reviewing the concern					
Safeguarding support already in place Tick and add name where known at time of report					
None	ESA or Support Assessment	Child in Need	Child Protection Plan	Looked After	Previous social care involvement
Name and role of allocated worker					
Data analysis: if the concern relates to child on child abuse, state which:		<p><i>This includes any reports and concerns, including those outside the school and online:</i></p> <ol style="list-style-type: none"> <li>bullying (including cyberbullying, prejudice-based and discriminatory bullying)</li> <li>abuse in intimate personal relationships between peers</li> <li>physical abuse</li> <li>sexual violence</li> <li>verbal abuse – sexual comments</li> <li>sexual harassment – in person, online</li> <li>causing someone to engage in sexual activity without consent – coercive behaviour</li> <li>consensual and non-consensual sharing of nudes and semi nudes images and or videos</li> <li><del>upskirting</del></li> <li>initiation/hazing type violence and rituals</li> <li>sexualised behaviour</li> </ol>			

Name of person taking actions	Actions/next steps Please detail conversation and rationale for decisions – include whether concerns were shared with parents/carers, MASH and if not outline reasons why.	Date of action

What would the child like to happen next?		
Has the child's wishes been considered when deciding action to be taken?	Yes	No
If no, please indicate why not		

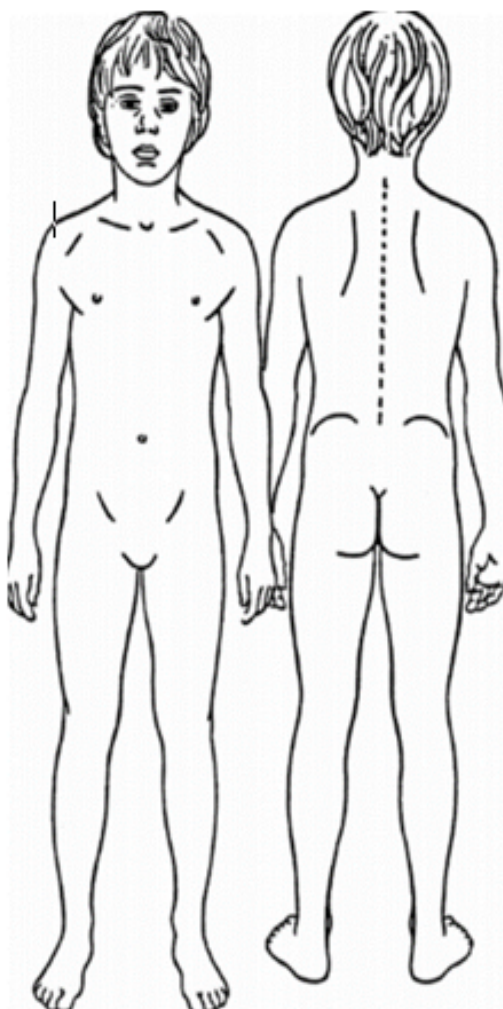


A summary of actions must be shared with the person who raised the concern			
<p>Summary of action discussion - please include any 'gut feeling elements' in the discussion and also the potential impact on the child.</p>		Date	
<p>If actions agreed Signature of person (overleaf) who raised the concern</p>			
<p>If actions <i>not</i> agreed A file note added to the child's file with a summary of discussion and the outcome/s. Signature of person who raised the concern overleaf</p>		File note document number	



## **Body Map**

**Children must not be undressed or photographs taken of any marks or injuries**



Palm



Back



SEA Team model Safeguarding concern record – schools - July 2023



## Allegations and concerns against adults in education settings – July 2024 (including schools, early years and alternative provision settings)

If you become aware that a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises, MAY have:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

If you have any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a scheduled area or behind a closed door; or,
- Humiliating pupils

Where a child also discloses abuse or neglect by a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises:

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the person/alleged abuser

Staff should self-refer to their line manager or Designated Safeguarding Lead where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

**Report immediately to the person in charge: HEAD**

Eg headteacher, principal, manager

**Any concern or allegation against the person in charge will be reported to CHAIR OF GOVERNORS**

Eg chair of governor, owner, chair of committee, nominated trustee

Unless there is clear evidence to prove that the allegation is incorrect, the person in charge **will decide on the nature of the allegation/concern:**

### Allegations that may meet the harm threshold

If the behaviour towards the child may have met the harm threshold ([KCSiE 2024, p.92](#)) report the allegation **within one working day** to the Local Authority Designated Officer (LADO) and your HR provider

- Contact the **Integrated Front Door (IFD) 0300 456 0108** and select Option 6 or email [LADO@wiltshire.gov.uk](mailto:LADO@wiltshire.gov.uk)
- Out of Hours Emergency Duty Service: **0300 456 0100** (5pm to 9am weekdays, 4pm Friday to 9am Monday)

### Allegations/concerns that do not meet the harm threshold (low-level concerns)

Refer to the allegation/concerns that do not meet the harm threshold, or 'low level' concerns addendum flowchart (below).



## Allegation/concerns guidance for persons in charge – July 2024



### Allegations that may meet the harm threshold

KCSIE 2024 Part 4 Section 1

#### The LADO will:

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

#### If the allegation threshold is met:

- A strategy meeting will normally be held.
- Usually, a senior manager/safeguarding lead, the LADO, HR, Police and social care are invited to attend.
- Relevant information is shared, risks to children are considered and appropriate action agreed eg child protection and other enquiries, disciplinary measures or criminal proceedings.
- A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

#### If the allegation threshold is NOT met:

The LADO will agree an appropriate response, eg for the setting to undertake further enquiries or an internal investigation.

Refer to the low-level concerns procedures on the right-hand-side.

### Allegations/concerns that do NOT meet the harm threshold ('low level' concerns)

KCSIE 2024 Part 4 Section 2

#### The person in charge will take the following actions:

- Reports about supply staff and contractors will be notified to their employers.
- Collect information to help them categorise the type of behaviour and determine what further action may need to be taken.
- If the concern has been raised via a third party, the person in charge (or a nominated deputy) should collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously, and
  - to the individual involved and any witnesses.
- All low-level concerns will be recorded in writing and will include details of the concern, the context in which the concern arose along with the rationale for decisions and action taken.
- Records will be kept confidential and held securely; it is recommended that it is retained at least until the individual leaves their employment.
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part 4, Section 1).
- Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
- The person in charge will seek advice from HR adviser and/or LADO consultation as appropriate.