

Penarth Group School

Safeguarding Policy 2018-2019

Designated Safeguarding Officer and Child Protection Officer

Stephen
Watson

Named Personnel with Designated Responsibility for Child Protection

Academic year	Designated Senior Officer	Deputy Designated Senior Officers	Designated Officers	Owner of Company	
2018-19	Stephen Watson	Carol Nolan		Pat Swallow	

Policy Review Dates

Review Date	Changes Made	By Whom
September 2018	Full review and update in line with Keeping children safe in education: information for all school and college staff Sept 2018	Designated Senior Officer.

Dates of Staff Training and Details of Course Title and Training Provider

	Date Trained and Training Provider	Date due for Renewal
Designated Senior Officer	Level 5 Designated Safeguarding Lead Officer Stockport LEA	June 2019
Deputy Senior Officer	Level 5 Safeguarding for senior leaders I can training.	September 2019

Whole School	An awareness of child abuse And neglect - Safeguarding Board	April 2018
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Company owner Review of Policy Dates

Named: Pat Swallow

Review Policy Date: September 2018 or before if appropriate due to change in legislation

This policy is written in accordance with the Penarth Group School policies and practice

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Policy Aims

This document is the Safeguarding Children Policy for Penarth Group School, which will be followed and adhered to by all members of the school and followed and promoted by those in the position of leadership within the organisation.

This document complies with section 2.2 of the DfE '**Safeguarding children and safer recruitment in education: Statutory guidance**' and has regard to DfE '**Working Together to Safeguard Children**' of **March 2015** and '**What to do if you are worried a child is being abused**' of **March 2015**. It has been updated to reflect **Keeping children safe in education Statutory guidance for schools and colleges September 2016**.

This document is also written in accordance with locally agreed inter-agency procedures.

The aim of this Child Protection Policy is to promote good practice; it applies to ALL staff, governors and non-employees working within Penarth Group School.

NB Individual external agencies to which the Penarth Group School make referrals are responsible for ensuring that their staffs are competent and confident in carrying out their responsibilities for safeguarding and promoting children's welfare – evidence will be an expectation as regards this area of child protection.

Penarth Group School is fully committed to ensuring that the application of this Safeguarding Policy is non-discriminatory in line with the UK Equality Act (2010). Further details are available in the school's Equal Opportunity Policy Document.

Penarth Group School seeks to implement this policy through adherence to the procedures set out in the rest of this document.

Safeguarding Children is everyone's responsibility

Safeguarding Children and providing them with appropriate safety and protection whilst in the care of Penarth Group School is paramount, it is everyone's responsibility to ensure a child is safe.

Safeguarding and promoting the welfare of children is defined for the purposes of this Policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Children includes everyone under the age of 18).

- The welfare of the child is paramount
- All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- All staff (employees and non-employees) have a responsibility to report concerns to the appropriate officer

INTRODUCTION

This policy applies to all adults, including non-employees, working in or on behalf of the school.

Keeping Children Safe in Education September 2016 states that 'Everyone who comes into contact with children and their families has a role to play in safeguarding children. School and college staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children 2015*. Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm'.

'Everyone working in or for our school service shares an objective to help keep children and young people safe by contributing to:

- providing a safe environment for students and young people to learn and develop in our School setting
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our school setting'

This document is reviewed annually or as events or legislation change requires by the Designated Senior Officer. This document is also reviewed by the Company owner. The next scheduled date for review is September 2017 or before if appropriate due to change in legislation.

In line with our Provision of Information policy, this document is available to all interested parties on our website and on request from the main school office and should be read in conjunction with the following documents:

- Safeguarding Policy
- Model Relations Policy
- Attendance Policy
- Behaviour Policy
- Educational Visits Policy

PENARTH COMMITMENT

Penarth Group School is committed to Safeguarding and Promoting the Welfare of all of its pupils. Each pupil's welfare is of paramount importance.

Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. We should respect all children, and will

work in consideration of the whole being of the child or young person, and we will include their physical, material and psychological well-being.

Children and young people’s welfare comes first in all our work.

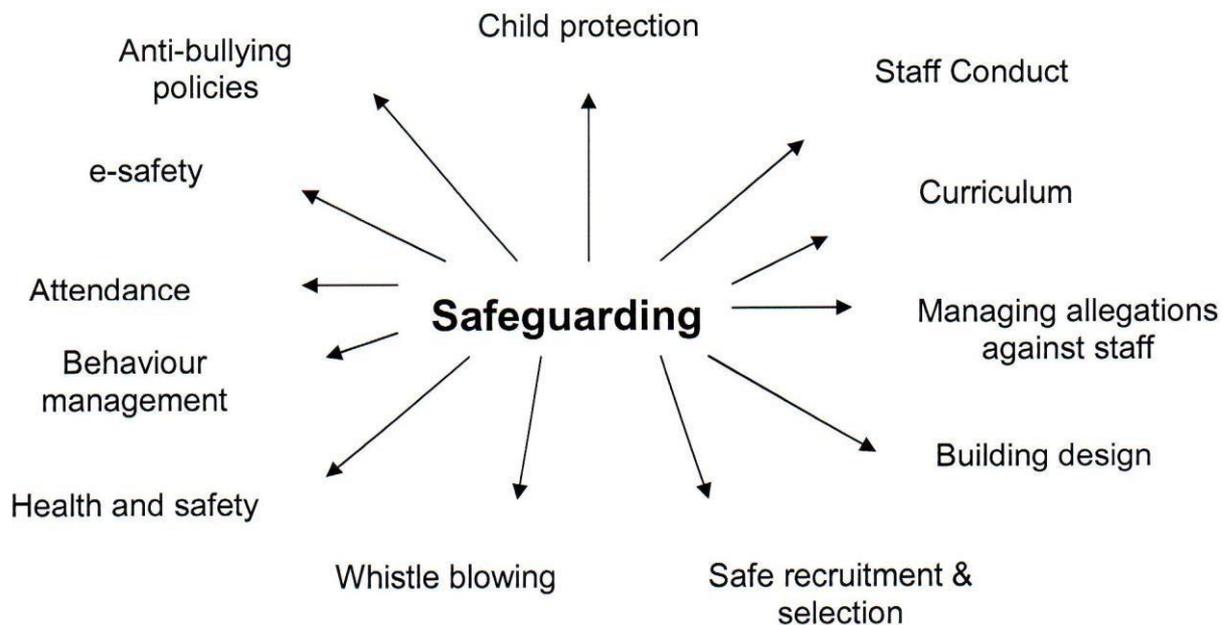
We recognise that some children may be especially vulnerable to abuse.

We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at Penarth Group School, some of their behaviours may be challenging.

We recognise that some children who have experienced abuse may harm others.

We will always take a considered and sensitive approach in order that we can support all of our pupils.

Any deficiencies or weaknesses in child protection arrangements will be remedied without delay.



PROVIDING A SAFE AND SUPPORTIVE ENVIRONMENT

1. Safer Recruitment and Selection

Penarth Group School pays full regard to current Department of Education and United Learning guidance and operates safe recruitment procedures including DBS checks and compliance with Independent School Standards Regulations. We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the students as a safe and trustworthy adult including; volunteers and people employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes

undertaking interviews, requesting references and undertaking Barred List and Disclosure and Barring checks.

In line with statutory changes, underpinned by regulations, the following will apply:

- An enhanced DBS check is obtained for **all** new appointments and volunteers to our school's workforce through staffing personnel and payroll.
- Penarth Group School is committed to keep an up to date Single Central Record (SCR) detailing the range of checks carried out on our staff and volunteers with the dates recorded for each check carried out.
- All new appointments to our school workforce who have lived outside the UK will be subject to additional checks as appropriate, including checking the right to live and work in the UK and relevant overseas police checks; the dates of all checks will be recorded.
- Penarth Group School uses supply staff only from the supply agencies that we have agreement in place with ensuring all safeguarding checks described above are carried out.
- Assurances are obtained from all agencies and organisations that regularly come into the school that all appropriate DBS checks and procedures are applied to any staff or volunteers employed by them.
- Should the situation arise that staff employed by another organisation to work with school pupils on another site, then assurances will be obtained that all appropriate DBS checks and procedures are in place.
- Identity checks must be carried out on all appointments to our school workforce before the appointment is made.

At least one member of each interview panel will have completed the Safer Recruitment in Education training.

Recruitment policy is that reference is made in job adverts to safeguarding checks that will be carried out and all recruitment processes are by application form only, CVs are not accepted, and references are taken up before any appointment can be confirmed. No open references are accepted.

Visitors

All visitors to the school must provide photographic identification at reception (Passports and Driving Licenses will be accepted, along with CORPORATE I.D). If they do not hold current enhanced DBS checks and have not provided evidence of the same to staff then they need to be accompanied by a member of school staff at all times, signed into and out of the building and their presence communicated to any staff working in the areas where they may see them or have them come into contact with them or the students. In this instance the visitor will be issued with a red lanyard indicating that they are a non-DBS checked visitor and therefore should be accompanied by a school member of staff. If the visitor does hold a current enhanced DBS check and has provided Reception staff with proof of the same then they will be issued with a yellow lanyard indicating that they do not need to be accompanied by an member of staff.

Visitors who are at the school more regularly, i.e. once a week for more than six weeks, are subject to more stringent checks including ID checks and may also be required to supply an up to date DBS check and supporting documents for records and noted on the SCR in the same way as a member of staff is, or to have the school apply for a DBS check after the other documents have been checked. In this case also, however, visitors are not left unaccompanied until the enhanced DBS is approved.

2. Safe Practice

Safe working practice ensures that pupils are safe, in respect of this all staff:

- are responsible for their own actions and behaviours and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- work in an open and transparent way;
- work with other colleagues where possible in situations open to question
- discuss and/or take advice from school management over any incident which may give rise to concern;
- record any incidents or decisions made;
- apply the same professional standards regardless of gender or sexuality;
- be aware of the confidentiality expectations
- be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

3. Safeguarding Information for Pupils

All Penarth Group school pupils are aware of staff who they can talk to. We are committed to ensuring that pupils are aware of behaviours towards them that are not acceptable and how they can keep themselves safe. We inform pupils of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

Penarth Group School has form tutors, whose role it is to be a point of contact for students with any problems affecting their learning, including family break up, attendance issues and those under the care of the local authority.

4. Partnership with Parents

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 unless we have permission or it is necessary to do so in order to protect a child.

Penarth Group School shares a purpose with parents to educate and keep students safe from harm

And too have their welfare promoted. Any referral made to Children's Services is shared with parents beforehand unless it is inappropriate to do so and Penarth Group School ensures regular contact with parents of all students.

5. Partnerships with others

Our school recognises that it is essential to establish positive and effective working relationships with other agencies.

There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all students.

6. Training and Staff Induction

Penarth Group School's member of staff with designated responsibility for child protection undertakes advanced child protection training and training in inter-agency working every 2 years. The Head teacher and all other Penarth Group School staff, including non-teaching staff, undertake basic child protection training to equip them to carry out their responsibilities for child protection effectively, which is kept up to date by refresher training at 3 yearly intervals. Or throughout the year with up to date issues.

All staff (including temporary staff and volunteers) are informed of the Penarth Group's child protection arrangements on induction and policies and procedures are always shared with them at an extended induction meeting.

7. Support, Advice and Guidance for Staff

- All new staff receive induction training in the systems and processes of the school, including child protection and safeguarding. This must be done before any new colleague begins any work with students.
- All staff undertakes full training in Child Protection and multi-agency working during their first year. This is renewable every three years.
- Staff will be supported in their work by the designated officer for safeguarding. (In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children).
- The designated senior person for Safeguarding and Child Protection will be supported by the Head teacher and Children's Services.
- Advice is available from Stockport Children's Services at any time via Locality, LSCB and Children's Services.

8. Related Penarth Group School Policies

'.....safeguarding covers more than the contribution made to child protection in relation to individual students. It also encompasses issues such as pupil health and safety and bullying.....and a range of other issues, for example, arrangements for meeting the medical needs of studentsproviding first aid, school security, drugs and substance misuse, positive behaviour etc. There may also be other safeguarding issues that are specific to the local area or population'
Safeguarding Children and Safer Recruitment in Education DfES 2007

- Penarth Group School Recruitment and Selection Policy outlines in detail all safer recruitment

processes.

- The Behaviour policy documents the school's procedures for incidents involving substance misuse.
- The Attendance Policy details the interventions in place related to poor attendance and when these are treated as safeguarding issues. The school follows the Stockport LA procedures "Children Who May Be Missing/Lost from Education". A child going missing from an education setting is a potential indicator of abuse or neglect. Staff members will follow their procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation.
- The Trips and Visits policy documents the checks that are carried out when a trip is going ahead; these include all reasonable checks and risk assessments regarding the safety of the site as well as the people students will come into contact with. In the event that a person on the site of a trip is not DBS checked they will not be left unaccompanied with our students at any time.
- This policy documents the process for disclosure/reporting of safeguarding allegations against a member of staff.
- The Internet Safe Usage Policy is signed by all staff and is renewed each year in order to ensure staff are reminded of the ICT Protocols.

9. Confidentiality

Penarth Group School ensures the confidentiality of its students and their families in all circumstances except those whereby there is an obligation to reveal particular information relating to the welfare of a young person in order to prevent harm, or to the LA in the normal accountability processes.

Information is shared only a need to know basis.

10. Pupil Information

Penarth Group School will endeavour to keep up to date and accurate information in order to keep students safe and provide appropriate care for them the school requires accurate and up to date information regarding:

- names and contact details of persons with whom the child normally lives and siblings
- names and contact details of all persons with parental responsibility (if different from above)
- emergency contact details (if different from above)
- details of any persons authorised to collect the child from school (if different from above)

- relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the child is or has been on the Child Protection Register or subject to a care plan
- name and contact detail of G.P.
- any other factors which may impact on the safety and welfare of the child

The school will collate, store and agree access to this information in files kept in the main office or, in the case of confidential information, in the security of the Designated Senior Officer for Child Protection's base.

11. Roles and Responsibilities

The Local Governing Body is responsible for the review and scrutinisation of Penarth Group School policies and giving feedback on these which should be fed into the Company owner.

Joint Governance means that the company owner, with the Local Governing Body has responsibility for ensuring:

- Penarth Group School has a child protection policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request;
- Penarth Group School operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with students;
- Penarth Group School has procedures for dealing with allegations of abuse against staff and non-employees that comply with guidance from the local authority and locally agreed inter-agency procedures;
- Staff undertake appropriate child protection training;
- Staff highlight, without delay, any deficiencies or weaknesses regarding child protection arrangements;
- In the event of allegations of abuse being made against the Head teacher, the Company owner would direct an investigation and would be responsible for liaising with the LA and /or partner agencies
- Where services or activities are provided on the school premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding students and child protection and liaises with the school on these matters where appropriate.

- They review their policies and procedures annually and provide information to the LA about them and about how the above duties have been discharged.

The Head teacher will ensure that:

- the policies and procedures adopted by the Proprietor are fully implemented, and followed by all staff;
- sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities; and
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to students, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies.

Senior Officer with Designated Responsibility for Child Protection will:

Ensure

- cases of suspected abuse or allegations are referred to the relevant investigating agencies;
- in cases of serious harm will inform the Police immediately
- act as a source of support, advice and expertise within the educational establishment for all stakeholders
- liaise with the Head teacher to inform him of any issues and ongoing investigations and ensure there is always cover for this role.

Training

- recognise how to identify signs of abuse and when it is appropriate to make a referral;
- have a working knowledge of how Stockport Children's Services operate, the conduct of a child protection case conference and be able to attend and contribute to these;
- ensure that all staff have access to and understand the Penarth Group School's child protection policy;
- ensure that all staff have induction training;
- keep detailed accurate secure records and/or concerns
- obtain access to resources and attend any relevant or refresher training courses at least every two years.

Raising Awareness

- ensure the child protection policy is updated and reviewed annually and work with the Company director regarding this;

- ensure parents are made aware of the child protection policy which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later;
- where a child leaves the school, ensure the child protection file is copied for the new establishment ASAP and transferred to the new establishment separately from the main pupil file. If a child goes missing or leaves to be educated at home, then the child protection file should be copied and the copy forwarded to Stockport Children's Services

All staff and volunteers will:

- fully comply with the School's policies and procedures
- attend appropriate training
- inform the designated person of any concerns
- wear their ID pass at all times whilst on the premises

IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM

Teachers and other adults in Penarth Group School are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

Definitions

As in the Children Acts 1989 and 2004, a **child** is anyone who has not yet reached his/her 18th birthday.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; **Development** means physical, intellectual, emotional, social or behavioural development; **Health** includes physical and mental health; **Ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse and Neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

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

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving students in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging students to behave in sexually inappropriate ways.

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to students that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on students. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing students frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

- provide adequate food and clothing, 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 caretakers)
- ensure access to appropriate medical care or treatment.

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

See also appendix 4.

TAKING ACTION TO ENSURE THAT CHILDREN ARE SAFE AT SCHOOL AND AT HOME

All staff follow the guidance issued by the Department of Education. Changes to this guidance are circulated to staff when appropriate.

It is **not** the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the designated senior officer with responsibility for child protection (or another senior member of staff in the absence of the designated officer) prior to any discussion with parents.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

1. Staff must immediately report to the DCPO or a named deputy:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, including non-attendance
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to students (e.g. living in a household with students present)

2. Responding to Disclosure

Disclosures or information may be received from pupils, parents or other members of the public. The school recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity and ensure that where necessary appropriate translation is available to allow students to express themselves clearly but without feeling threatened.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person by recording this on note of concern form (Monitoring System which securely monitors child protection, safeguarding and student welfare).

Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm following allegations of abuse by one or more pupils against another pupil the DCPO will report their concerns to Stockport Children's Services in addition to any appropriate school disciplinary action.

Principles

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the designated person in order that she can make an informed decision of what to do next.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm
- clarify the information
- try to keep questions to a minimum and never ask leading questions, instead asking questions of an 'open' nature e.g. 'Can you tell me what happened?', 'what do you mean by that?' rather than 'Did x hit you?' Leading questions must be avoided so as not to jeopardise any future potential criminal investigations.
- try not to show signs of shock, horror or surprise
- not express feelings or judgments regarding any person alleged to have harmed the child
- explain sensitively to the person that they have a responsibility to refer the information to the senior designated person
- reassure and support the person as far as possible ensuring the child knows they have done nothing wrong and have been right in telling someone
- explain that only those who 'need to know' will be told
- explain what will happen next and that the person will be involved as appropriate

If staff have concerns about a child they should raise these with the DCPO. This also includes situations of abuse which may involve staff members. The safeguarding lead will usually decide whether to make a referral to children's social care, but it is important to note that any staff member can refer their concerns to children's social care directly.

3. Action by the Designated Child Protection Officer (or other Designated Deputy Officer in their absence)

Following any information raising concern, the senior designated person will consider:

- any urgent medical needs of the child

- making an enquiry to find out if the child is subject to a Child Protection Plan
- discussing the matter with other agencies involved with the family
- consulting with appropriate agencies e.g. Social Care
- the child's wishes

Then decide:

- wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk
- whether to make a child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately
- make a referral to the local social services department immediately, as far as possible, and no later than 24 hours (in writing or with written confirmation of a telephoned referral) of a disclosure or suspicion of abuse.

OR

- not to make a referral at this stage
- if further monitoring is necessary
- if it would be appropriate to undertake an assessment (e.g. completion of Common Assessment Framework form), Early help intervention and/or make a referral for other services

All information and actions taken, including the reasons for any decisions made, will be fully documented on note of concern forms. All referrals to social care will be accompanied by a standard referral form (CAF).

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

4. Action Following a Child Protection Referral

The Designated Child Protection Officer or other appropriate member of staff will:

- make regular contact with the Social worker involved to stay informed
- wherever possible, contribute to the Strategy Discussion
- provide a report for, attend and contribute to any subsequent Child Protection Conference

- if the child or children are placed on the Child Protection Register, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences
- where possible, share all reports with parents prior to meetings
- where in disagreement with a decision made e.g. not to apply Child Protection Procedures or not to convene a Child Protection Conference, discuss this with the Safeguarding Unit.
- where a child on a Child Protection Plan moves from the School or goes missing, immediately inform the key worker in Social Care

5. Recording and monitoring

Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. Information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All C.P. documents will be retained in a 'Child Protection' file, separate from the child's main file. This will be locked away and only accessible to the Head teacher and DCPO. These records will be copied and transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of Designated Person Child Protection.' If the child goes missing from education or is removed from roll to be educated at home then any Child Protection file should be copied and the copy sent to the Education Social Work Service.

From 2010, original copies will be retained until the child's 25th birthday.

6. Supporting the Child and Partnership with Parents

- Penarth Group School recognises that the child's welfare is paramount, however good child protection practice and outcome is it relies on a positive, open and honest working partnership with parents
- Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child
- We will provide a secure, caring, supportive and protective relationship for the child
- Students will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The Designated Senior Officer will determine which members of staff need to know personal information and what they need to know for the purpose of supporting and protecting the child.

See appendix 5 for flow diagram of 'Action when a child has suffered or is likely to suffer harm'

Parents will not be consulted before a referral to Social Care if child discloses any of the following information

- Where Sexual Abuse or Sexual exploitation is suspected
- Where organised or multiple abuse is suspected
- Where fabricated or induced illness is suspected
- Where planned or actual female genital mutilation is suspected
- Where contacting parents/carers would place a child, yourself or others at immediate risk
- Where there are concerns over possible forced marriage – at home or abroad

You **MUST NOT** discuss your concerns on any of the above matters with parents/carers.

You **MUST** report this directly to the Designated CP Officer - Stephen Watson .

Making a referral to the Contact Centre

A referral involves giving Children's Social Care or the Police information with regards concerns relating to an individual or family. Parents or carers will be informed if a referral is being made unless circumstances prevent this.

This will be done by Stephen Watson.

Information required when making an initial referral.

- Your name, telephone number and position
- Pupil family name
- Pupil address
- Pupil date of birth
- Ethnicity, first language and any special needs
- Information of allegation:-
- Such as where incident took place
- When it took place
- Time and date
- People involved
- Injuries if any
- Parent/Carer awareness of disclosure

USEFUL NUMBERS

Designated Child Protection Officer DCPO (Stephen Watson)
Telephone 0161 483 1212

CONTACT CENTRE – SOCIAL CARE
Telephone 0161 217 6028
Out of Hours 0161 7118

STOCKPORT SAFEGUARDING CHILDREN UNIT and LADO
Telephone 0161 474 5657

Senior Advisor for Safeguarding in Education (Julia Storey)
Telephone 0161 474 5958

Safeguarding Head of Service Stockport (Jane Connolly)
Telephone 0161 474 5656

POLICE CENTRAL SWITCHBOARD
Telephone 0161 872 5050
999 for emergencies

7. Allegations Regarding Person(s) Working In or On Behalf of Penarth Group School (including Volunteers)

Where an allegation is made against any person working in or on behalf of the school that he or she has:

- a. Behaved in a way that has harmed a child or may have harmed a child
- b. Possibly committed a criminal offence against or related to a child or
- c. Has behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

We will apply the same principles as in the rest of this document.

Allegations against staff, volunteers or the designated person with responsibility for safeguarding must be reported to the Head teacher or, in the Head teacher's absence, the Company Director of Penarth Group.

Investigations will be carried out under the guidance of LA procedures, with union representatives and with HR support.

Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

Staff have a responsibility to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil for example; in one to one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil and so on. The Model Relations Policy is to be used in conjunction with this Safeguarding Policy.

Initial Action

- The person who has received an allegation or witnessed an event involving a member of staff or other adult in the building will immediately inform the Head teacher.
- The Head teacher will take steps, where necessary, to secure the immediate safety of students and any urgent medical needs
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of students
- The DCPO may need to clarify any information regarding the allegation, however no person will be interviewed at this stage
- The DCPO will consult with the Local Authority Designated Officer (LADO) in order to determine if it is appropriate for the allegation to be dealt with by school or if there needs to be a referral to social care and/or the police for investigation. The school will not undertake their own investigations of allegations without prior consultation with the LADO.

- Consideration will be given throughout to the support and information needs of pupils, parents and staff
- The Principal will inform the Chair of Governors of any allegation and subsequent actions.
- In the event that an allegation is made against the Head teacher it must be reported directly to the Managing Director of Penarth Group, the chair of the LGB and the LADO by the person receiving the allegation. The Penarth Managing Director will proceed from this point as the 'Head teacher' in the following steps.
- The DCPO is required to report to the Disclosure and Barring Service (DBS) within one month of leaving the school any person (whether employed, contracted, volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. A failure to make such a report to the DBS constitutes an offence. Compromise Agreements cannot be offered in these circumstances.

Adopted by the Penarth Group School LGB on 30th September 2016

Signed by P Swallow (Chair of Governors)



Date 30th September 2016

Signed by S Watson(Principal)



Date 30th September 2016

APPENDIX 1; Penarth Group School Policy Statement – Tracking of Visitors and Contractors

Visitors

All staff have a responsibility to ensure the following:

- Ensure any that any Visitor coming into the school has been told they need to bring either their passport or driving license as a form of photographic identification, or their CORPORATE ID. A visitor who fails to bring their photographic identification more than three times will not be allowed entry to the school.
- If visitors have been DBS checked then the school needs to know well in advance of their name and DBS number.
- An e-mail must be sent to Penarth Group school at least 24 hours in advance with a list of names, the organisation they are from, what member of staff will be responsible for them and their expected time of arrival.
- When collecting visitors, staff must ensure that they have signed in, had their ID checked and are wearing their visitor pass
- Staff must ensure that visitors are escorted back to reception when departing, sign out of the visitor book and hand their pass back to Reception.

In addition to the above it is a requirement that all staff wear their ID badge around their neck at all times whilst on the premises.

The visitors' book is located on the Reception desk and is clearly marked. It **MUST** be completed by all visitors to the school.

Note: ID Checks

Before signing in a supply member of staff, agency member of staff or interview candidate, the member of staff on Reception should carry out an ID check prior to the visitor signing in. Only photographic identification will be accepted as formal proof of identity.

The member of staff who has carried out the ID check should complete the "Daily Visitor Log" to indicate that the ID check has taken place and their staff initials should be recorded in the relevant area.

On occasion, it may be appropriate for another member of staff to conduct the ID check however this will still be logged at the Main Reception in the "Daily Visitor Log".

Signing In

- Visitors should complete the Visitor Book, including car registration details if they have a car in the car park.
- Visitors should be reminded to sign out and return their pass when leaving.

Signing Out

Members of staff should escort their visitor back to Reception to ensure they sign out and return their Visitors Pass.

All passes should be returned.

At 08:00 each day, any passes returned after school hours should be checked for any passes returned after 17:00 from the previous day and again be cross referenced with the visitor book and the time of 17:00 recorded as a signing out time.

Contractors

All contractors coming on site should be notified that they will be required to show photographic identification upon arrival, only passports and driving licenses will be accepted.

Contractors should sign in and out in the contractor's book, wear their ID pass at all times whilst on site and should complete the Permit to Work when necessary.

The site team should be contacted to collect the contractor from Reception.

All contractors should be accompanied by a member of the site team at all times during their visit unless:

- Students are not on site
 - They have an Enhanced DBS check by a trusted body
-

Daily Visitor Log

The Daily Visitor Log should be filed at the end of each day in the Visitor Log File.

If there are any visitors who have not signed out and have not returned their pass, an email should be sent to the member of staff whom they were visiting to alert them to the fact that their visitor did not sign out and did not return their pass.

Breach of Process

Continued failure to adhere to the above process will result in staff being informed.

APPENDIX 2; Penarth Group School Policy Statement – After School Activity Registration and Student Safety

1. Members of staff who are running the activity will keep a register of the students who are attending the activity and be responsible for those students. The register will be kept by the member of staff in charge of the activity and it will be the responsibility of the Activity Coordinator to ensure registers are being completed: the registers for all activity will be monitored half termly by the AP in charge of Activity.
2. Students who are involved in activities outside of normal school hours remain the responsibility of the school. Where students are involved in organised activities attendance is recorded accurately and appropriate risk assessments and health and safety measures are in place.
3. Where the activity is off site a full risk assessment is in place and all parents/ carers permission will be sought. A list of the different activities and the student's names of all the students attending will be left in the head teacher's along with the contact phone number of the member of staff who is with the students.

The above allows Penarth Group School to;

1. Ensure the safety of our students
2. Monitor the number of students who are accessing our After School Activity programme
3. Analyse the micro populations who are accessing our After School Activity Programme

How is Penarth Group School ensuring the safety of its students?

1. Registering students ensures that staff are aware which students are on site after 2.40pm in case there is a fire alarm so all students can be accounted for.
2. Registering students also ensures that if a parent contacts the school to see if their child is at school we are able to say whether they are in school taking part in after school provisions or not. As reception staff can easily see what is taking place they can contact the relevant member of staff to check.
3. Activities are fully supervised by members of staff.
4. If students go off site for their activity a parental consent form is signed and returned.

Fire Alarm after core hours

1. The member of staff who is taking any activities is responsible for students if there is a fire alarm, and must bring a paper register with them to ensure all students are accounted for.

APPENDIX 3; Penarth Group School Policy Statement – Tracking of Non-Employees

1. Ask whether the person has been DBS checked. If so the HR needs the original copy of this DBS or an email from the body who completed the check confirming the date and DBS number.
2. Non-Employees will be issued with a visitor's badge. This must be handed in each time they leave the premises.

Appendix 4 ; Indicators of abuse – what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised.

The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DCPO to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Children who may be particularly vulnerable and at risk of abuse

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we give special consideration to pupils who are:

- disabled or have special educational needs
- living in a domestic abuse situation
- affected by parental substance misuse
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- are not fluent in the English language

Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats.

Note: Penarth Group School considers forced marriage to be abuse and deals with such incidents through this Child Protection (Safeguarding) Policy.

Further information on Child Sexual Exploitation, Female Genital Mutilation and Sexting

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM) professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. 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. Warning signs that FGM may be about to take place, or

may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Since 2015 it has been statutory to report FGM.

Forced marriage – this includes links to relevant government guidance documents, which are in Section 2, Legal Position and Section 6, General Guidelines for all Cases.

It was updated in May 2012 to include a link to the document published by the Forced Marriage Unit: Forced Marriage and Learning Disabilities: Multi Agency Practice Guidelines (2011).

Contents:

1. Introduction
2. Legal Position
3. The Impact on Children and Young People
4. Possible Symptoms and Indicators
5. Motives
6. General Guidelines for all Cases
7. Contacts

1. Introduction

Forced marriage is an issue that is often misunderstood and misrepresented. It is often confused with arranged marriages. Forced marriage is an abuse of human rights. A clear distinction should be made between forced and arranged marriages.

Forced marriages cannot be justified on religious or cultural grounds. Every faith condemns it and freely given consent is a prerequisite of Christian, Jewish, Hindu, Muslim and Sikh marriages.

The difference between forced and arranged marriages. In the tradition of arranged marriages, the family of both spouses take a leading role in arranging the marriage, but the choice whether or not to accept the arrangement remains with the young people and can be exercised at any time. In forced marriages, one or both spouses do not consent to the marriage and some element of duress is involved. Duress can range from physical, emotional and psychological pressure to threatening behaviour, abduction and imprisonment, physical violence and murder. Forced marriage is primarily, but not exclusively, an issue of violence against women. Most cases involve young women and girls but there is evidence to suggest this can also happen to young men and boys.

Some young British Nationals have travelled abroad either to visit families and for a specific event where they have found themselves in completely different, unexpected and unacceptable circumstances, including being forced into marriage under duress. Violence and confiscation of passport and air tickets have all been used to force the compliance of reluctant 'spouses to be'.

Loving manipulation is common in many cases, where parents genuinely feel that they are acting in the best interest of child and family. They believe that they are protecting their children, building stronger families, and preserving cultural or religious traditions. This is not justified on religious or cultural grounds.

2. Legal Position: The minimum age of consent to marriage is sixteen. A person between sixteen and eighteen years of age cannot marry without the consent of their parents unless they are a widow or widower.

Although there isn't a criminal offence of 'forcing someone to marry' within England and Wales a number of criminal offences may be committed including:

- Threatening behaviour;

- Assault;
- Kidnap, abduction and/or imprisonment;
- Sexual intercourse without consent is rape.

The existing legal framework offers a great deal of protection to children at risk of being forced into marriage, for example through the Children Act or the court's inherent wardship jurisdiction. In addition, the Forced Marriage (Civil Protection) Act 2007, which was implemented in November 2008, makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent (through Forced Marriage Protection Orders).

Anyone threatened with forced marriage or forced to marry against their will can apply for a Forced Marriage Protection Order. Such an order can be granted to prevent a marriage occurring or, where a forced marriage has already taken place, to offer protective measures. Orders may contain prohibitions (e.g. to stop someone from being taken abroad), restrictions (e.g. to hand over all passports and birth certificates and not to apply for a new passport), requirements (e.g. to reveal the whereabouts of a person or to enable a person to return to the UK within a given timescale) or such other terms as the court thinks appropriate to stop or change the conduct of those who would force the victim into marriage. A power of arrest may be added where violence is threatened. Breaches of such orders are not criminal offences but will be dealt with as contempt of court and the court will have a full range of sanctions, including imprisonment.

Fifteen County Courts have been designated to deal with applications.

Third parties such as relatives, friends, voluntary workers and police officers can apply for a protection order with the leave of the Court. Since 1 November 2009, local authorities can apply for a protection order for a vulnerable adult or child without the leave of the court.

For further advice and information about how to make such an application, see the guidance for local authorities on applying for Forced Marriage Protection Orders, published by the Ministry of Justice in November 2009.

3. The Impact on Children and Young People

The implications of a forced marriage for the young person are often extreme. Isolation is a major problem. They may feel they have no-one to talk to about their situation and fear being ostracised by their community if they complain. A young person who faces a forced marriage may be withdrawn from school and may not be allowed to go out with friends or to social activities. They may feel they cannot tell anyone or seek help to escape a forced marriage, consequently they may suffer emotionally, leading to depression and self-harm. In some reported cases where young people have tried to escape a forced marriage by running away, the families have solicited hired help 'bounty hunters' to find them and in a number of tragic cases the young person has been murdered.

Young people forced into marriage often become estranged from their families. Sometimes they become trapped in the cycle of abuse with serious long-term consequences. Many women forced into a marriage suffer for many years from domestic violence and feel unable to leave because of their children, lack of family support, economic pressures and other social circumstances. Some victims may

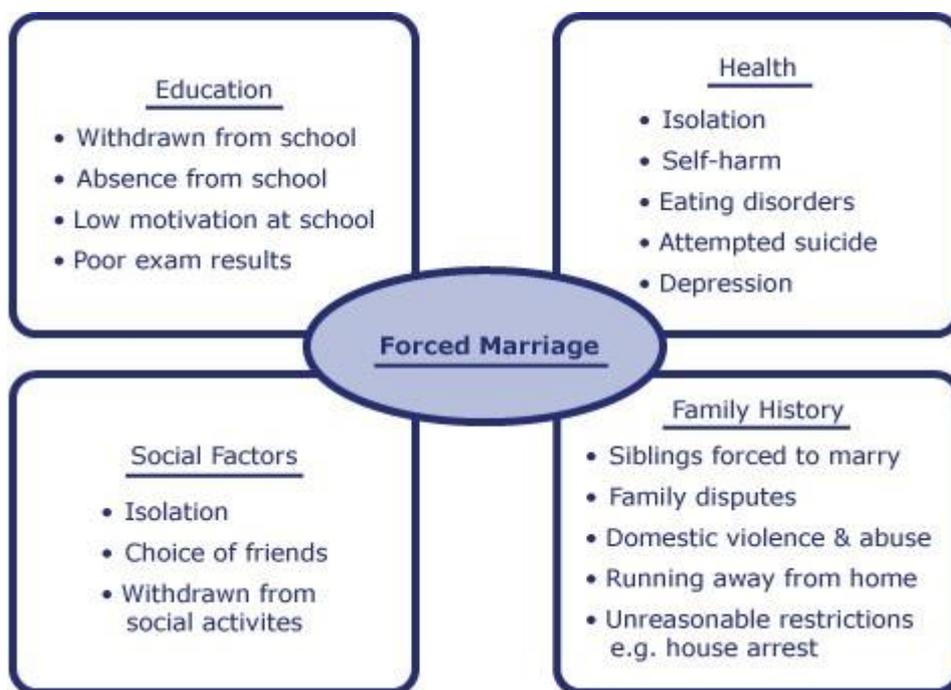
be vulnerable adults. They may have a disability or learning difficulty and be unable to challenge the situation.

School based staff members need to be aware that a young person facing a forced marriage may face Significant Harm if their families become aware that they have sought assistance from school or another agency. Confidentiality must be considered paramount.

4. Possible Symptoms and Indicators

The factors set out in the diagram below collectively or individually may be an indication that a young person fears that they may be forced to marry, or that a forced marriage has already taken place.

Forced Marriage Symptoms and Indicators



5. Motives

The following are some possible motives:

- Controlling unwanted behaviour and sexuality (including perceived promiscuity, or being gay, lesbian, bisexual or transgender) – particularly the sexuality and behaviour of women;
- Protecting the family honour;
- Responding to peer group or family pressure;
- Attempting to strengthen family links;
- Ensuring land, property and wealth remain within the family;
- Debt repayment;
- Alleviation of poverty;
- Protecting perceived cultural ideals;
- Protecting perceived religious ideals;
- Preventing unsuitable relationships, e.g. outside the ethnic, cultural, religious or caste group;
- Assisting claims for residence and citizenship;
- Fulfilling long-standing family commitments;

- Appease/placate an aggrieved family.

Cases of forced marriage can involve complex and sensitive issues that should receive the attention of a worker's first-line manager and be reported to the police child abuse investigation unit (CAIU).

6. General Guidelines for all Cases

Do not:

- Do not treat such allegations merely as a domestic issue and send the young person back to the family home as part of routine child protection procedures;
- Do not ignore what the young person has told you or dismiss out of hand the need for immediate protection;
- Do not approach the young person's family, friends or those people with influence within the community, without the express consent of the young person, as this will alert them to your enquiries;
- Do not contact the family in advance of any enquiries, either by telephone or letter;
- Do not share information outside child protection information-sharing protocols, except in consultation with the line manager and the Child Abuse Investigation Unit. The reason should be recorded and signed;
- Do not breach confidentiality except where necessary in order to ensure the young person's safety;
- Do not attempt to be a mediator.

Please refer to Government guidance on Forced Marriages:

The Right to Choose – Multi Agency Statutory Guidance for Dealing with Forced Marriage.

Information and practice guidelines for professionals protecting, advising and supporting victims.

Forced marriage: information leaflets, statutory guidance, practice guidelines for support organisations

And the following practice guidance published by the Forced Marriage Unit in June 2009:

Multi Agency Practice Guidance: Handling Cases of Forced Marriages (2009)

Forced Marriage and Learning Disabilities: Multi Agency Practice Guidelines (2011).

7. Contacts

Foreign and Commonwealth Office

Police Choice Helpline 0800 5999 818

Sexting - The law - Sexting is a complex issue. Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. 'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what is the recognised standard of propriety. 13 For most purposes, if imagery contains a naked young person, a topless girl, and/ or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

Initial response -

All incidents involving youth produced sexual imagery should be responded to in line with the school's safeguarding and child protection policy.

When an incident involving youth produced sexual imagery comes to a school attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in school, or any member of the school or college staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or college, or inform the police directly.

Staff need to remember the person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

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

An immediate referral to police and/or children's social care¹⁶ should be made if at this initial stage:

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there

are concerns about their capacity to consent (for example owing to special educational needs)

3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any pupil in the imagery is under 1317
5. You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply, then a school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

The decision is made by the DSL with input from the Head teacher and input from other members of staff if appropriate. The decision is then recorded in line with school policy. The decision is in line with the school's child protection procedures and is based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people. The decision should be reviewed throughout the process of responding to the incident.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for us to manage the incident directly. However, in contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, would generally be referred to police and/or children's social care. If staff have any doubts about whether to involve other agencies, you should make a referral to the police and contact MASH team for guidance.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks, the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSL will always use their professional judgement in conjunction with their colleagues to assess incidents.

Informing parents (or carers)

Parents (or carers) should be informed and involved in the process at an early stage unless informing

the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the young people to inform their parents themselves. Annex C contains further advice and information about involving parents and carers.

Reporting incidents to the police

If it is necessary to refer to the police, contact should be made through existing arrangements through a PCSO (Police Community Security Officer), local neighbourhood police or by dialling 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Things to be aware of when making reports to the police:

- Be aware that the police are not able to offer general advice on incidents. If the children involved are named or specifics are provided they are duty-bound to record and investigate all criminal activity reported.
- When making a report through the 101 service, be aware that the person answering the call is a call handler who deals with a wide variety of crimes and may not have specialist knowledge in this area. Ensure any crime reference numbers provided are recorded.

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Children's social care contact and referrals

If the DSL is aware that children's social care are currently involved with a young person involved in an incident of youth produced sexual imagery then they should contact children's social care. They should also contact children's social care if they believe they may be involved, or have been involved with a young person in the past. If as a result of the investigation the DSL believes there are wider issues which meet the threshold for children's social care involvement then they should make a referral in line with their child protection procedures. DSLs should ensure that they are aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support schools in responding to youth produced sexual imagery. Penarth Group school would contact Multi-Agency Safeguarding Hub (MASH) as would be the most appropriate place for schools to initially make a referral.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of

the DSL and should always comply with the child protection policy and procedures of Penarth Group School. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil.

If a decision is made to view imagery the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery, then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice (note this advice is for schools only).¹⁹ If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems) then DSLs should ensure that the staff member is provided with appropriate support.

Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

Deletion of images

Penarth group school may decide that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

The Searching, Screening and Confiscation advice highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery. See Amended Education Act 2011 which amended Education Act 1999.

In most cases Penarth Group school will not view imagery or search through devices and delete imagery unless there is good and clear reason to do so. Generally young people are asked to delete imagery and to confirm that they have deleted the imagery. Young people are given a deadline for deletion across all devices, online storage or social media sites. Young people are reminded that possession of youth produced sexual imagery is illegal. They are informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged

in the safeguarding records. Parents and carers are also informed unless this presents a further risk to the young person.

Penarth group school may invoke our own disciplinary measures to discourage young people from sharing, creating or receiving images however this is at the discretion of the headteacher.

Interviewing and talking to the young person/people involved

Once we at Penarth Group school has assessed a young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL should carry out this conversation. However, if the young person feels more comfortable talking to a different teacher, this should be facilitated where possible.

When discussing the sharing of youth produced sexual imagery, it is important that the DSL:

- Recognises the pressures that young people can be under to take part in sharing such imagery and, if relevant, supports the young person's parents to understand the wider issues and motivations around this.
- Remains solution-focused and avoids questions such as 'why have you done this?' as this may prevent the young person from talking about what has happened.
- Reassures the young person that they are not alone and the school or college will do everything that they can to help and support them.
- Helps the young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the imagery.
- Discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL if this ever happens.

The purpose of the conversation is to:

- Identify, without looking, what the image contains and whether anyone else has been involved.
- Find out who has seen or shared the image and how further distribution can be prevented.

Recording incidents

All incidents relating to youth produced sexual imagery are recorded at Penarth Group School using our note of concern. This includes incidents that have been referred to external agencies and those that have not.

Reporting youth produced sexual imagery online

Young people may need help and support with the removal of content (imagery and videos) from devices and social media, especially if they are distressed. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the young person.

Within in our schools PSHE policy and schemes of work we will look at issues that are relevant to all our specific students and may at times cover some in more depth alongside the normal teaching of PSHE.

For example, the current issues surrounding sexting and child sexual exploitation due the extra needs of our students.

Safeguarding children with additional needs / or disabilities

Evidence on the extent of abuse among children with disabilities suggests that they are at increased risk of abuse, and that the presence of multiple disabilities appears to increase the risk of both abuse and neglect. Research also indicates that, as well as being the least protected, children with disabilities are also the least consulted in routine assessments. Penarth Group School seeks to address and challenge these practices by affirming their understanding of the issues facing children with disabilities and its commitment to removing the barriers that prevent children with disabilities from accessing their rights.

Private fostering

A privately fostered child is a child under 16 (or 18 if disabled) who is being cared for, for 28 days or more, by an adult who is not their parent, step parent, grandparent, aunt, uncle, sister or brother. It's usually a cousin or great aunt, a friend of the family, or someone who has agreed to take care of the child by private arrangement without involving the council. The parent is still legally responsible for their child. We have a legal duty to ensure children in this situation are safe and well.

Documents for Reference

Keeping children safe in education

Statutory guidance for schools and colleges

September 2016

Department of Education Sexting in schools and colleges:

Responding to incidents and safeguarding young people

DfE

Searching, Screening and Confiscation advice

Safeguarding Children and Safer Recruitment in Education (DfES 2006)

Working Together to Safeguard Children (HM Government March2015)

What to do if you're worried a child is being abused

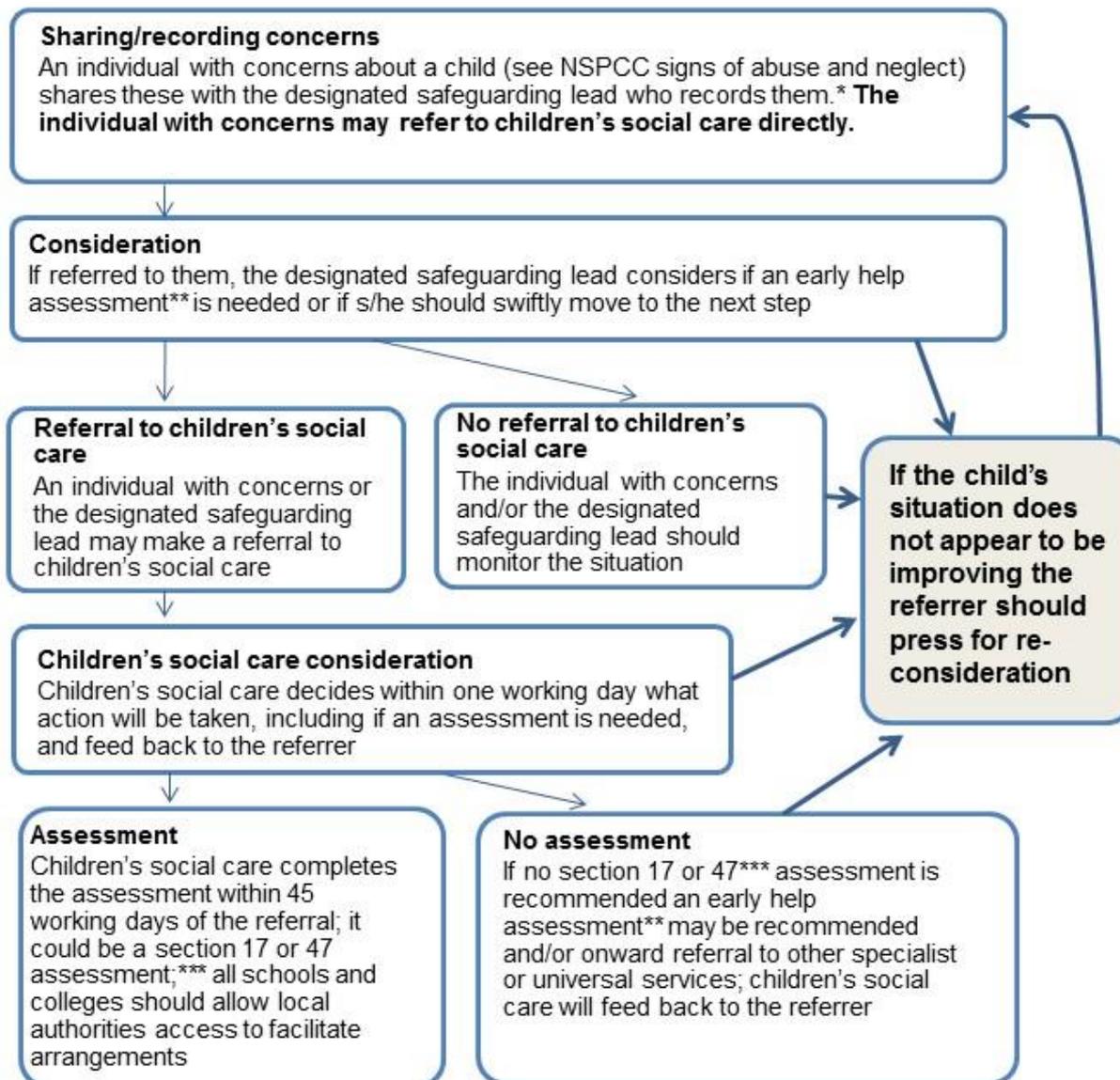
(HM Government March 2015)

The Education Act 2011 amended the power in the Education Act 1999 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the head teacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.

Anybody can make a referral.



* In cases which also involve an allegation of abuse against a staff member, see part four of this guidance which explains action the school or college should take in respect of the staff member

** Where a child and family would benefit from coordinated support from more than one agency (eg, education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

*** Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns local authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.