



Safeguarding Policy and Procedures

October 2017

CONTENTS

Introduction

Legislation and Guidance

Related Policies

Policy Aims

Principles and Values

Equality Statement

1. Roles and Responsibilities:
 - Governing Body*
 - Designated Safeguarding Lead (DSL)*
 - All Staff*
 - Volunteers, work experience and students*
 - Parental Responsibilities*
 - Children's Responsibilities*
2. Confidentiality and Information Sharing
3. Communication with Parents / Carers
4. Types and Signs of Abuse
5. Children Missing from Education
6. Child Sexual Exploitation
7. Honour Based Violence
8. Female Genital Mutilation
9. Preventing Radicalisation
10. Peer on peer abuse
11. Private Fostering Arrangements
12. Advice: What to do if there is a concern about a child
13. Looked After Children and the Virtual School Headteacher
14. Children with Special Educational Needs and disabilities
15. Safer Recruitment
16. Staff Induction
17. Safeguarding Training
18. Safer Working Practices
19. Management of Allegations Against Staff
20. E-Safety, Computing and Use of Mobile Technology

INTRODUCTION

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

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.

Safeguarding is what we do for all children to keep them safe whilst in our care. Child protection describes the policy and procedures specifically for those children who are at risk of serious harm or have been seriously harmed.

At Bilston Nursery School we are committed to safeguarding children and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that may worry them.

Legislation and Guidance

The Governing Board of Bilston Nursery school recognises and is committed to fulfilling its statutory responsibility to safeguard and promote the welfare of children in accordance with the following legislation and guidance:

- The Education Act 2002 (section 175/157)
 - Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- Wolverhampton Safeguarding Children's Board - Inter Agency Procedures
- Thresholds of Support to Children and Families in Wolverhampton
- Working Together to Safeguard Children (March 2015)
- Keeping Children Safe in Education (September 2016)
- Information sharing advice for safeguarding practitioners (March 2015)
- What to do if you are worried a child is being abused (March 2015)
- Sections 26 & 29 of the Counter-Terrorism and Security Act 2015
- Section 5B of the Female Genital Mutilation Act 2003
- Children Act 1989 & 2004 amendment
- Disqualification under the Children Act 2006
- The School Staffing (England) Regulations 2009
- Statutory Framework for the Early Years Foundation Stage

Related Policies

The following related policies form part of our procedures to safeguard children:

Managing children with Medical Needs
Staff Code of Conduct
Behaviour Policy
Attendance Policy

Whistleblowing Policy
Health and Safety
Intimate Care Procedures
Staff Induction Policy

Policy Aims

- To provide Staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities;
- To ensure consistent good practice across the school; and
- To demonstrate our commitment to protecting and supporting our vulnerable children, children who need support through early help, children in need and children who have a child protection plan.

Principles and values

- We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.
- We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.
- We maintain an attitude of “it could happen here” where safeguarding is concerned.
- We will adopt a ‘child-centred’ approach to safeguarding and child protection and we will act in the ‘best interests’ of our children
- We ensure that everyone is aware of their safeguarding responsibilities
- We provide staff, volunteers and governors with the framework, training and support they need in order to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care.

Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

1. Roles and Responsibilities

Governing Board

(PART TWO - KEEPING CHILDREN SAFE IN EDUCATION SEPTEMBER 2016)

Our Safeguarding Link Governor is Mr Peter Prescott

Our Chair of Governors is Mrs Kath Rogers

Our Governing Board will ensure they comply with their duties under legislation, they will have regard to 'Keeping Children safe in Education' September 2016 to ensure that the policies, procedures and training in our schools are effective and comply with the law at all times

Our Governing Board will ensure:

Safeguarding policies:

- Appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These policies will include an effective safeguarding policy, a code of conduct for adults which will amongst other things include - acceptable use of technologies, staff/pupil relationships and communications including the use of social media;
- These policies, along with part one of Keeping children safe in education – September 2016 and information regarding the role of the designated safeguarding lead, will be provided to all staff on induction. Our Governing Board will take a proportional risk based approach to the level of information that is provided to temporary staff and volunteers;
- Our safeguarding policy will describe procedures which are in accordance with government guidance and refer to locally agreed inter-agency procedures put in place by the Wolverhampton Safeguarding Children Board (WSCB), be updated annually (as a minimum), and be available publicly via our school website;
- That the above policies and procedures, adopted by our Governing Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff; and
- Appropriate safeguarding responses are in place to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

Designated Safeguarding Lead (DSL):

- That they appoint an appropriate senior member of staff, from the school leadership team, to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection matters. Their role will be made explicit in the role-holder's job description (see Annex B which describes the broad areas of responsibility and activities related to the role);
- They determine whether they choose to have one or more deputy designated safeguarding lead(s) as appropriate. Any deputies appointed will be trained to the same standard as the designated safeguarding lead;
- That whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility will not be delegated;
- That the designated safeguarding lead and any deputies will liaise with the local authority and work with other agencies;
- That during term time the designated safeguarding lead and or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Our Governing Board will arrange, in liaison with the DSL, adequate and appropriate cover arrangements for any out of term activities; and

- The designated safeguarding lead and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years. The DSL will attend Prevent training. In addition to their formal training, as set out above, their knowledge and skills will be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually.

Inter-agency working:

- That our school contributes to inter-agency working in line with the statutory guidance 'Working together to safeguard children'. Our school will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Our school will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment;
- That our safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the WSCB. This will include understanding and reflecting local protocols for assessment and the WSCB's threshold document along with supplying information as requested by the WSCB; and
- Information is shared appropriately between professionals and local agencies.

Staff Training:

- That all staff members undergo safeguarding and child protection training at induction. The training will be regularly updated. Our induction and training will be in line with advice from WSCB. In addition all staff members will receive regular safeguarding and child protection updates (for example, via staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively; and
- Our Governing Board recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity will therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

Online Safety:

- Appropriate filters and appropriate monitoring systems are in place and take care that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Opportunities to Teach Safeguarding:

- Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Inspection

- They are familiar with the Ofsted New Common Inspection Framework and safeguarding: Inspecting safeguarding in early years, education and skills settings.

Safer Recruitment:

- They prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate

decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Our school has written recruitment and selection policies and procedures in place; and

- At least one person on any appointment panel has undertaken appropriate safer recruitment training.

Managing Allegations:

- There are procedures in place to handle allegations against teachers, headteachers, educators, practitioners, volunteers and other staff. Such allegations will be referred to the designated officer, Paul Cooper, at the local authority by the appropriate person; and
- Procedures are in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. Our Governing Board is aware that this is a legal duty and failure to refer when the criteria are met is a criminal offence.

Allegations of abuse made against other children

- That staff should recognise that children are capable of abusing their peers. Our Governing Board will ensure that our safeguarding policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with taking into account the age and development stage of our pupils.

The Child's wishes

- The child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Systems and processes will operate with the best interests of the child at their heart.

Looked after children

- That staff have the skills, knowledge and understanding necessary to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

The designated teacher

- They appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training.

Virtual school heads

- The designated teacher works with the virtual school head to discuss how looked after children funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.

Children with Special Educational Needs and Disabilities

- Our safeguarding policy reflects the fact that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Designated Safeguarding Lead (ANNEX B KCSIE 2016)

Our DSL is Emma Smith

Our Deputy DSL/s are Lyanne Ellitts and Wendy Binder

At Bilston Nursery School the designated lead in line with Keeping Children Safe in Education 2016 is expected to:

Manage referrals:

- 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; and
- Refer cases where a crime may have been committed to the Police as required.

Work with others:

- As required, liaise with the "case manager" (as per Part four KCSIE 2016) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Undertake training:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but 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 intervention.
- 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 safeguarding 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
- 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;
- Obtain access to resources and attend any relevant or refresher training courses; and
- 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.

Raise Awareness:

- Ensure the school safeguarding policies are known, understood and used appropriately;
- Ensure the school safeguarding 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 safeguarding 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; and
- Link with the WSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child Protection File:

- Ensure a child's protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability:

- Be available (during school hours) for staff in the school to discuss any safeguarding concerns and contactable by telephone during activities during the school holidays.

All staff

The Teacher Standards (2012) state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We extend this level of duty to include all of the staff and volunteers who work at Bilston Nursery School.

- All staff have a responsibility to provide a safe environment in which children can learn;
- All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff have a responsibility to take appropriate action, working with other services as needed;
- 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;
- During induction all staff members will be made aware of the systems within our school which support safeguarding and these will be explained to them as part of their induction. This includes: the safeguarding policy; the staff code of conduct; KCSIE 2016, role of the DSL and the names of the designated safeguarding lead and deputies. (Please refer to our Induction policy and procedures);
- All staff members will receive appropriate safeguarding updates regularly, but at least annually;
- All staff members will be made aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection;

- 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 best interests of the child and talk to the DSL;
- Staff should ensure that if a child has made a disclosure, they are aware that the information will only be shared with the DSL and other adults that wish to keep them safe, in an age appropriate manner. Under no circumstances, should staff agree to keep information a secret, even if they intend to share it; and
- A child going missing from an education setting is a potential indicator of abuse or neglect. Staff members should follow the school procedures for dealing with children who go missing, particularly on repeat occasions. This includes reporting concerns of absence.

Volunteers, work experience and students:

During induction, volunteers, work experience and students will be given information about how to report any concerns about children's safety and welfare. Further, they will be briefed on the school's confidentiality policy and the code of conduct that we expect from all in our school.

Therefore volunteers and students have the responsibility to:

- Work within the school's code of conduct, KCSIE 2016, safeguarding policy and confidentiality/information sharing expectations; and
- Immediately share any concerns about a child's welfare with the DSL.

Parental Responsibilities

At Bilston Nursery School we have an open door policy where we encourage parents to share any concerns regarding their own children or any other child/children who they feel may be at risk of harm. All concerns will be explored in a sensitive and timely manner. Parents /carers should ensure their child attends school and that they arrive on time and are collected on time.

We expect parents/carers to notify us of any changes in family circumstances and inform us of any changes of address and contact numbers.

Children's Responsibilities

In our school we respect our children. The atmosphere within our school is one that encourages all children to do their best and to talk freely about any concerns or worries. We provide opportunities that enable our children to take and make decisions for themselves. Children will always be taken seriously and listened to if they seek help from a member of staff. Our school encourages all pupils to share any worries or concerns with any adult in the school at any time.

2. Confidentiality and Information Sharing

Our school adopts the principles outlined in the DfE Information Sharing Guidance (March 2015)

We recognise that all matters relating to child protection are confidential. The Headteacher or DSLs will disclose any information about a child to other members of staff on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with other statutory agencies in order to safeguard children.

All staff must be aware that they cannot promise a child or parents to keep secrets which might compromise the child's safety or wellbeing. If a child wishes to confide in a member of staff/volunteer and requests that the information is kept secret, the member of staff/volunteer will tell the child, in an appropriate manner to the individual needs of the child, that they cannot promise confidentiality and may need to pass the information on to help keep the child or other children safe. All information and data is stored securely and any information or data is shared on a need to know basis.

3. Communication with Parents

The school will endeavour to ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children. This information is provided on our school web-site and in induction documents when a child starts school.

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

Staff should speak to parents about matters that may be explained as normal age appropriate behaviour or marks such as bruises unless the nature of these raises suspicion that the child may be at risk of harm. Our school recognises that, due to their age, pupils will arrive at school with bruises, marks or scratches that are a normal part of growing up and staff will speak to parents about these as normal part of our practice.

Our school will always discuss concerns with parents/carers and consent for any referrals should be sought by the DSL unless to do so would:

- Place the child at risk of significant harm or further risk of significant harm;
- Place a vulnerable adult at risk of harm; and
- Compromise any enquiries that need to be undertaken by children's social care or the police.

In the best interests of safeguarding children there may be occasions when the school has to consult with other agencies without a parent or carer's prior knowledge. Our first concern and responsibility is the child's welfare and we have a duty to protect children first and always. Such consultation may result in a formal referral which could prompt visits from social care and/or the police. We fully understand that this can be a very distressing set of circumstances. Our school will follow the procedures required by the Wolverhampton Safeguarding Children Board.

Our school will employ the services of an interpreter if required.

4. Types and Signs of Abuse

Types and signs of abuse

All staff and volunteers are familiar with the types and signs of abuse, they are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

All staff are expected to be vigilant at all times, taking account of the following.

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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.

Some signs:

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non-mobile children
- Injuries in unusual areas or with well - defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive
- Arms and legs kept covered in hot weather
- Reluctance to remove clothing for PE or swimming

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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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.

Some signs:

- Physical, mental or emotional development delay
- Abnormal attachment to parents/carer
- Low self-esteem
- Lack of confidence
- Over-reaction to making mistakes
- Fear of new situations
- Fear of parents being contacted
- Self-harm

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Some signs:

- Aggression
- Withdrawn
- Self-harming, including eating disorders
- Distrust of familiar adult
- Wetting or soiling day and night
- Fear of undressing for sport or swimming
- Sleep disturbances or nightmares
- Apparent secrecy about social activities or special friends
- Inappropriate sexualized conduct
- Drawings of sexual behaviours
- Sexually explicit behaviour

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 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.

Some signs:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- neglect of or unresponsiveness to a child's basic emotional needs
- Under weight for age
- Hungry
- Tired
- Poor state of clothing for the child's size, weather or time of year
- Persistently dirty with a body odour
- Frequent lateness or non-attendance
- Compulsive stealing or scavenging
- Poor health and untreated medical problems
- Lack of immunisations
- Frequently missed medical appointments

The list of signs is not an exhaustive list.

If staff recognise any of these signs they should not presume that the child is being abused, but MUST report their concerns to the DSL or DDSL.

5. Children Missing from Education (KCSIE – Annex A pg 51)

(PLEASE NOTE THIS SECTION MAY CHANGE IN SEPT 2016 DUE TO AMENDMENTS THE GOVERNMENT INTEND TO IMPLEMENT)

Staff at Bilston Nursery School are aware that a child going missing from education is a potential indicator of abuse or neglect. Whilst attendance at Nursery School is non-statutory our staff will follow the school's procedures for unauthorised absence and for dealing with children that go missing from education to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Our school has appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. Parents of children who have been absent from school for three days without a reason being given, will be contacted. If, after repeated attempts, parents can not be contacted the school will make further enquiries including contacting:

- other contacts whose details are on file
- local schools and the early help service to identify if child has been registered

If the whereabouts of the child can not be identified the case will be raised, if appropriate, at the Locality drop-in session with social care and early help services.

Our staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones and Female Genital Mutilation.

Our school has admission and attendance registers. All pupils are placed on both registers.

6. Child Sexual Exploitation (CSE)

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);

- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

At Bilston Nursery School we understand that any child in any community may be vulnerable to child exploitation, we will be alert to the fact that child sexual exploitation is complex and rarely presents in isolation of other needs and risks of harm (although this may not always be the case, particularly in relation to online abuse). Child sexual exploitation may be linked to other crimes and we will be mindful that a child who may present as being involved in criminal activity is actually being exploited.

At Bilston Nursery School we are aware that the following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

We understand that not all children and young people with these vulnerabilities will experience child sexual exploitation. **Child sexual exploitation can also occur without any of these vulnerabilities being present.**

Children rarely self-report child sexual exploitation or are unable to due to their level of development so we understand it is vitally important that all staff at Bilston Nursery School are aware of the potential indicators of risk, which for very young children may including:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Exclusion or unexplained absences from school,
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

We will remain open to the fact that child sexual exploitation can occur without any of these risk indicators being obviously present and be alert to the potential signs of abuse and neglect and to understand the procedures set out by local multi-agency safeguarding arrangements.

At Bilston Nursery School we will provide information and raise awareness of CSE including the signs, vulnerabilities and reporting procedures in line with WSCB guidelines

Staff will report any concerns regarding children at risk of CSE to the DSL or Deputy DSL who will then make a referral and liaise with other relevant statutory agencies, for example, social care, police and health professionals as required

Wolverhampton CSE Co-ordinator is Sandeep Gill

7. 'Honour based violence'

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If staff have any concerns they will speak to the designated safeguarding lead.

8. 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. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for staff to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Any Teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally.. Unless the member of staff has a good reason not to, they should also discuss any such case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL.

The duty does not apply in relation to at risk or suspected cases. In these cases, all staff should inform the DSL and follow local safeguarding procedures.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary or stomach problems
 - Avoiding physical activities
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

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

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

9. Preventing Radicalisation

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard" to the

need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the statutory "Revised Prevent duty guidance: for England and Wales" (for schools) summarises the requirements on schools in terms of four general themes:

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

At Bilston Nursery School, we aim to build the children's resilience to radicalisation by providing a safe environment and through particular aspects of the curriculum including social and emotional development and promoting British Values.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force. We recognise that the risk of radicalisation is greater for older children but that our younger pupils may be at risk from actions taken by older siblings or parents.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home by providing information for parents on online safety on the school web-site.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) identify signs that a pupil is being radicalised. Signs that may apply to younger children or their families can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Talking as if from a scripted speech
- A sudden disrespectful attitude towards others
- Increased levels of anger

If staff are concerned about a pupil, older sibling or parent, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. The Government has launched 'Educate against hate' a website designed to equip school leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school leaders, such as Prevent e-learning, via the Prevent Training catalogue. A link to the 'Educate against hate' site is available on the school's web-site along with information for parents about prevent and British Values.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required

Our staff will co-operate with local Channel panels as required and where concerns have been raised the DSL will make a referral to the Channel programme.

The Wolverhampton Prevent Team (West-Midlands Counter Terrorism Unit) can be contacted on: 101 select option 3 and then 8713036

Prevent Officers are:

PC Holder PC Nixon PC Hall

10. Peer on Peer Abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up".

We recognise that some very young children are yet to develop the ability to managing their behaviours or feelings and may have had limited experience of socialising with other children. This may result in unwanted behaviours such as hitting or scratching, towards other children particularly those they have developed a bond with.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Includes behaviours that are not age appropriate and may indicate that a child has been exposed to behaviours or experiences that they are mimicking
- Is violent
- Involves sexual exploitation or sexual abuse, such as indecent exposure or sexual assault

Allegations against other children which are safeguarding issues

Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations may include physical abuse, emotional abuse or sexual abuse. Other gender issues that can be prevalent when dealing with peer on peer abuse could, for example, include girls being sexually touched or assaulted. We recognise that pupils at the school are very young and it is likely that peer on peer abuse incidents are more likely to involve older children and relate to their behaviour towards younger children or those who are vulnerable. Younger children may disclose information relating to older children who are not pupils at the school. Staff take all incidents seriously and will consider each case carefully.

It is likely that, to be considered a safeguarding allegation against a child, some of the following features will be found.

If the allegation:

- Is made against an older child and refers to their behaviour towards a younger child or a more vulnerable child;
- Is of a serious nature, possibly including a criminal offence;
- Raises risk factors for other children in the school;
- Indicates that other children may have been affected by this child; and
- Indicates that young children outside the school may be affected by this child.

Examples of safeguarding issues against a child could include:

Physical Abuse

- Violence, particularly pre-planned;
- Forcing others to use drugs or alcohol; and
- Initiation and hazing violence (abuse or humiliation used as a way of initiating a person into a group).

Emotional Abuse

- Blackmail or extortion;
- Threats and intimidation; and
- Cyber-bullying.

Sexual Abuse including sexting and gender based violence

- Indecent exposure, indecent and inappropriate touching or serious sexual assaults;
- Forcing others to watch pornography or take part in sexting; and
- Initiation and hazing violence.

Sexual Exploitation

- Encouraging other children to engage in inappropriate sexual behaviour
- Photographing or videoing other children performing indecent acts.

Prevention, assessing and minimising the risks

At Bilston Nursery School we will minimise the risk of allegations against other children by:

- Providing a developmentally age appropriate curriculum which develops children's understanding of acceptable behaviour and keeping themselves safe;

- Ensuring statutory supervision levels are in place so that a child is within sight or sound of an adult at all times
- Having systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued;
- Developing robust risk assessments and providing targeted work for children identified as being a potential risk to other children; and
- Training and awareness sessions will be provided for staff.

Procedure to manage peer on peer allegations

- When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the designated safeguarding lead (DSL) will be informed;
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances;
- The DSL should contact social care/multi-agency agency safeguarding hub (MASH) to discuss the allegation and seek advice;
- The DSL will follow through the outcomes of the discussion and make a referral where appropriate;
- If the allegation indicates that a potential criminal offence has taken place, this will be referred to the multi-agency agency safeguarding hub MASH where the police will become involved;
- Following advice from Social Care and/or the police, parents of both the child being complained about and the alleged victim, should be informed and kept updated on the progress of the referral;
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files;
- It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures;
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual behaviour procedures;
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan; and
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

11. Private Fostering Arrangements

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18 if disabled) who is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer; for 28 days or more. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts, (whether of full blood, half blood, or marriage/ affinity.)

School staff will notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. Our school is aware that we need to report any private fostering arrangements that we become aware of to the Local Authority.

On admission to the school, a full birth certificate or official document detailing persons with parental responsibility for the child must be presented.

12. What to do if there is a concern about a child

Staff must immediately report to the DSL:

- 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 children (e.g. living in a household with children present)

12.1 Responding to Disclosures

Disclosures or information may be received from children, 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.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person and make a record.

The School will ensure that members of the public wishing to make disclosures are provided with contact information for Social Care and will be encouraged to raise their concerns with the Social Care team. The school will also inform Social Care of any disclosure made and if possible provide contact details of the informant so support any further investigation.

12.2 If a child is in immediate danger

If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and /or the police immediately.

Anybody can make a referral. Although, where a child is registered at school, consultation should take place with the school's DSL or Deputy, who will often be the most appropriate person to initiate any referral. A written record of the concerns should be made using the schools internal recording form. This should be used to aid in the decision making process if a referral is needed to the MASH/Central Referral Hub.

For referral to the MASH/Central Referral Hub, phone 01902 555392 and speak to a social worker. Any action will need to be followed up with a written confirmation on the MARF (Multi Agency Referral form). Out of hours: 01902 55299

12.3 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm, keep an open mind and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL.

You should not:

- Make false promises;
- Interrupt/Interrogate/Investigate;
- Assume e.g. this child tells lies/good imagination;
- Make suggestions about what is being said;
- Speculate or accuse anyone;
- Show anger or shock
- Tell the child to go and speak to someone else;
- Discuss with parent/carers without speaking to the DSL, or their deputy;
- Discuss with any other staff before speaking to DSL, or deputy;
- Leave any related written information laying around;
- Jump to conclusions about people's behaviour without knowing the facts;
- Investigate an allegation of child protection concern yourself;

12.4 If you have concerns about a child

If you have concerns about a child's welfare and the child is not in immediate danger you must speak to the DSL, Deputy DSL or most Senior member of staff first to agree a course of action. You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

The DSL will consider:

Is this a child with unmet needs where health, development or achievement may be affected? Wolverhampton Supporting Children' Model says practitioners should form a Team around the Family (TaF) and complete an Early Help Assessment (EHA) when:

- Age appropriate progress is not being made and the causes are unclear; or
- The support of more than one agency is needed to meet the child or young person's needs.

If this is a child with additional needs the DSL or deputy will discuss the issues with the child's parents/carers. The DSL will obtain parental consent for an Early Help Assessment to be completed.

Is this a child in need? Section 17 of the Children Act 1989 says:

- The child is unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development;
- The child's health or development is likely to be impaired, or further impaired without the provision of such services; and
- The child has a disability.

Is this a Child Protection matter? Section 47 of the Children Act 1989 says:

- Children at risk or who are suffering significant harm;
- Children suffering the effects of significant harm; and
- Serious health problems.

All concerns, child with unmet needs, Child in Need and Child Protection matters, should be discussed with the Designated Safeguarding Lead and will need to be assessed and referred using the correct channels by the school as soon as possible. It is important to recognise anybody can make a referral where they believe a child to be in imminent danger or at risk of harm.

Where a case reaches the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under Section 47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm.

It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

Significant harm may also arise from a combination of significant events which are both acute and long standing and which impair the child's physical, psychological and social development. In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

Children's Wishes

Children's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Staff members do not promise confidentiality and always act in the best interests of the child.

Record Keeping

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

All Child Protection documents will be retained in a 'Child Protection' file, separate from the child's main file. 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.' Original copies will be retained until the child's 25th birthday.

13. Looked After Children and the Virtual School Headteacher

Our Looked after children lead is Lyanne Ellitts

Our LAC lead will undertake any relevant training to update their skills, understanding and knowledge enable them to keep our looked after children safe. Our Looked after children lead will promote the educational, physical, social and emotional welfare of children who are looked after.

Our LAC Lead will ensure:

- They are aware of the legal status (interim care order, full care order, voluntary arrangements of any looked after child at Bilston Nursery School)
- They obtain information regarding, contact arrangements with birth parents or those with parental responsibility;
- They obtain information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him or her;
- They obtain the name of the child's social worker;
- They obtain the name and contact details of the virtual head in the local authority that looks after the child; and
- They liaise with the virtual school headteacher to discuss how the funding for that child can be best used to support the child's need outlined in the personal education plan.

14. Children with special educational needs and disabilities

At Bilston Nursery School we are aware that children with special educational needs and disabilities may face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

We will ensure we have appropriate mechanisms in place to assist these children which include:

- Suitably trained professionals including the SENCO
- Staff training
- Referrals to and support from the Early Years Special Needs Service
- Communication strategies including Makaton and the use of signs and symbols

15. Safer recruitment

In order to create a safe environment for our children our school will adopt the safer recruitment procedures that help deter, reject or identify people who might abuse children, outlined in part 3 of Keeping Children Safe in Education 2016. Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

Our school adheres to statutory responsibilities to check staff who work with children, making decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad will be conditional on satisfactory completion of the necessary pre-employment checks and satisfactory references. Upon appointment of new staff our school will:

- Verify a candidate's identity;
- Obtain an enhanced DBS certificate(including barred list information, for those who will be engaging in regulated activity);
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- Verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- Verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then advice will be taken from the Schools HR provider and information provided on the GOV.UK website;
- if the person has lived or worked outside the UK, make any further checks considered appropriate;
- Verify professional qualifications, as appropriate; and
- Check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State.

Our school understands that it is a criminal offence to allow any individual who is barred to carry out any form of regulated activity. Our school will comply with the legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Our school makes decisions about the suitability of any prospective employees based on checks and evidence including; criminal record checks (DBS), barred list checks and prohibition checks together with references and interview information.

Consideration is given to the regulated activity prospective employees will be engaged in. In summary, a person will be considered to be engaging in regulated activity if as a result of their work they:

- Will be responsible, on a regular basis in a school, for teaching, caring for or supervising children;

- Will carry out paid or unsupervised unpaid, work regularly in a school where that work provides an opportunity for contact with children; and
- Engage in intimate or personal care or overnight activity, even if this happens only once.

For all other staff who have opportunity for regular contact with children who are not engaging in regulated activity, the school requires an enhanced DBS certificate, which does not include a barred list check.

For anyone appointed to carry out teaching work, an additional check will be undertaken to ensure they are not prohibited from teaching.

A European Economic Area (EEA) check will also be completed if required to check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed.

Our school keeps a Single Central Record that complies with all the requirements. It is monitored by the Headteacher and Chair of Governors at regular intervals.

The Single Central Record covers the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school this means those providing education to children;
- Students
- Volunteers;
- Governors; and
- Agency and third-party staff

The following information will be recorded on the Single Central Record:

- An identity check;
- A barred list check;
- An enhanced DBS check/certificate;
- A prohibition from teaching check;
- Further checks on people who have lived or worked outside the UK; this would include recording checks for those EEA teacher sanctions and restrictions;
- A check of professional qualifications; and
- A check to establish the person's right to work in the United Kingdom.

Our school will obtain written confirmation that the employment business supplying staff has carried out the relevant checks and obtained the appropriate certificates.

All employees, agency staff, volunteers and governors MUST show their current original DBS certificate to the school as soon as they take up post.

Disqualification by Association

In addition to an inclusion on the Children's Barred List, there are a number of wider disqualification criteria that disqualify staff from working with children. One such criteria disqualifies a person if they live in the same household where another person who is disqualified lives or works. This is known as disqualification 'by association'.

KCSiE 2016 requires schools to ensure that staff working with early years provision, have had appropriate checks including disqualification by association.

The requirement to provide the relevant information about a person who lives or works in the same household as an employee of this School, guards against an individual working with young children who may be under the influence of a person who lives with them and where that person may pose a risk to children i.e. 'by association'.

The following categories of staff are covered by the Childcare (Disqualification) Regulations 2009:

- staff who work in early years provision (including teachers and support staff working in school nursery and reception classes);
- staff working in later years provision for children who have not attained the age of 8 including before school settings, such as breakfast clubs, and after school provision;
- staff who are directly concerned in the management of such early or later years provision

It is the responsibility of staff to inform the Head Teacher of any person with whom they live that they are aware would be disqualified under the 2009 regulations. The school requires staff to complete a declaration form and evidence of this is recorded on the School Central record.

16. Staff Induction

All staff members will undergo safeguarding training at induction. The training will be regularly updated. Induction and training provided will be in line with advice from the WSCB. Upon appointment and starting the new post, new staff, students and volunteers will be issued with an induction pack, safeguarding policy, Keeping Children Safe in Education -Part 1 , annex A and annex B, Whistleblowing policy, code of conduct and other relevant safeguarding information . They will sign to say that they have received it, read and understood it. A meeting will be arranged on appointment to clarify and check understanding and to respond to any questions.

17. Safeguarding Training

Designated Safeguarding Lead

Our designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

Our designated safeguarding lead will undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but 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 intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

- 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 our 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
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support our 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;
- Obtain access to resources and attend any relevant or refresher training courses; and
- 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.

Staff Training

All staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. We recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity will therefore be provided for staff to contribute to and shape safeguarding arrangements and policy.

Governor Training

All governors are invited and encouraged to attend safeguarding training.

Safer Recruitment Training

Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

18. Safer working practices

Our school has a code of conduct, all staff and volunteers are issued with this at induction.

Staff should seek to keep personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- Work in a room where there is a glass panel in the door or leave the door open;
- Make sure that other adults visit the room occasionally;
- Avoid working in isolation with children unless thought has been given to safeguards;
- Must not give out personal mobile phone numbers or private e-mail addresses;
- Must not give pupils lifts home in your cars;
- Must not arrange to meet pupils or their parents outside of school hours; and
- Must not contact pupils or their parents on social websites.

Under the Sexual offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

The School has a duty to ensure that professional behaviour applies to relationships between staff, children and their parents/carers, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. Staff are provided with a copy of the DCFS 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education settings' Mar 2009.

Physical Contact, Intervention or Restraint

It is common for School staff to have physical contact with young children. These occurrences may include:

- Changing a child's nappy
- Changing soiled children
- Comforting young children
- Holding young babies

Staff are required to follow the School's protocols for changing children and record occasions when children are changed. Changing records will be kept by the School for a minimum of three years. Changing records will be checked and monitored regularly by a member of the Senior Management Team.

We accept that due to the nature of the School's work staff regularly come into physical contact with young children. Children often require comfort and very young children require physical contact to provide personal care.

The need to use restraint or physical intervention with young children is uncommon and is discouraged unless necessary. Where it is necessary, physical intervention or restraint should only be used to manage a child's behaviour:

- to prevent personal injury to the child,
- to prevent injury to another child or an adult,
- to prevent serious damage to property which in turn could injure another child,
- in what would reasonably be regarded as exceptional circumstances.

Any occasion where physical intervention is used to manage a child's behaviour will be recorded in the schools physical intervention file and parents informed about the incident and provided with a copy of the record on the same day.

The Senior Management Team act as the School's named persons with responsibility for behaviour management. They will provide guidance to staff on behaviour management issues and arrange access to expert advice if ordinary methods are not effective with a particular child.

Volunteers

Close consideration is given to the role of volunteers in the School and the level of checks that are required as to their suitability to work with children.

- volunteers working within the School will be supervised by a member of staff at all times.
- volunteers are not permitted to provide personal care and are not permitted to be alone with children.
- volunteers working within the School may be permitted to work unsupervised for periods of time in the administration areas of the building away from direct access to children

- students who return to the School to volunteer will be treated as students as the necessary checks will have been made
- the school will obtain an enhanced DBS certificate without a barred list check for all volunteers

Students

It is a requirement of teacher training providers and other training establishments to ensure that an enhanced DBS certificate and barred list check is completed at the point in which a training place in their institution has been accepted. In line with WSCB's recommendations the School will require written confirmation from the training provider that appropriate checks have been made prior to a student starting a placement. Details will be recorded on the single central record.

Contractors

The School checks the identify of contractors on arrival in the building. Contractors working with children within the School will be required to provide evidence of DBS checks where they are coming into close contact with children or working unsupervised such as sports coaches or independent therapists.

Contractors undertaking work to the site will not be given unsupervised access to areas of the building where children are present.

Local Authority

Written confirmation is received at regular intervals from the local authority that staff employed by the Council to work in schools have received the necessary background and employment checks including enhanced DBS checks. These include cleaning and caretaking staff. Copies of these written confirmations are held by the school.

Visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to use the signing in system and wear a visitor's badge. All staff have a responsibility to check the identity of individuals not wearing a visitors badge.

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

Staff taking medication/other substances

Staff must not be under the influence of alcohol or any other substance which may affect their ability to care for and safeguard children. Where staff are taking medication which is

known to cause possible side effects which may affect their ability to undertake their role fully such as causing drowsiness, staff must seek medical advice as to how the medication may affect their work and discuss this with a senior member of staff. It is the responsibility of all staff to inform senior staff of any medication that may affect their work so that appropriate risk assessments can be made. Staff will only be permitted to work with children if medical advice confirms that the medication is unlikely to impair their ability to look after children properly.

Staff medication must be secured in staff lockers provided and not be taken into rooms where children have access. Staff must inform their line manager if they bring medication, other than inhalers, into the school.

19. Management of Allegations against Staff

Our school has adopted the Local Authority 'Grey Book' Managing Allegations Policy.

Our policy complies with the guidance set out in Part four of Keeping Children Safe in Education 2016.

All allegations of abuse of children carried out by any staff member or volunteer will be taken seriously. If an allegation is made regarding a member of staff or volunteer, the following will be considered:

Has the member of staff/volunteer:

- Behaved in a way that has harmed a child, or may have harmed a child?
- Possibly committed a criminal offence against or related to a child?
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children?

If an allegation is made against a member of staff or volunteer the headteacher must be informed immediately or as soon as possible within 1 working day and he or she must contact the Designated Officer (Paul Cooper) immediately to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

If an allegation is made against the headteacher, the chair of governors, must contact the Designated Officer (Paul Cooper) immediately or as soon as possible within 1 working day to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

Our procedures and approach to dealing with allegations will be applied with sensitivity and common sense. Our school will exercise its duty of care to employees, we will act appropriately to manage and minimise the stress inherent in the allegation process. Our school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

At Bilston Nursery School we understand that there is a legal requirement for employers to make a referral to the DBS where we think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up and a referral to the DBS *must* be made, if the criteria are met (outlined in KCSiE 2016, paragraph 120)

The Designated Officer in Wolverhampton is Paul Cooper (550661)

Supporting Those Involved

Staff involved in an allegation will be supported by the school and the Council's disciplinary procedures ensure that staff are offered appropriate support and representation.

Parents or carers of a child or children involved will be told of an allegation as soon as possible. Where discussion with the LADO has identified the need to involve the police or social services, a strategy discussion should be held prior to informing parents so that an agreement can be made as to what information is disclosed to them.

Parents and carers will be made aware of the prohibition on reporting or publishing allegations about teacher in section 141F of the Education Act 2002 and will be advised of the need to seek legal advice if they wish to apply to court to have these restrictions removed.

Whistleblowing

All staff, volunteers and parents at Bilston Nursery School should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and such concerns will be taken seriously by our headteacher, governing body and senior leadership team. Our school has adopted a Whistleblowing policy and appropriate procedures, which are suitably reflected in staff training and staff behaviour policies and are in place for such concerns to be raised with our headteacher, governing body or senior leadership team.

Where a staff member feels unable to raise an issue with our headteacher, governing body or senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, for example:

The NSPCC 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 and Email: help@nspcc.org.uk

20. E-Safety, Computing and Use of Mobile Technology

The E-Safety lead is Emma Smith

The growth of different electronic media in everyday life and an ever developing variety of devices including PC's, laptops, mobile phones, webcams etc. place an additional risk on our children. Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children, or the parents of young children, with a view of grooming them for inappropriate or abusive relationships or to gain access to children.

Access to abusive images is not a 'victimless' act as it is already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with pupils at this school.

At Bilston Nursery School software (filters, firewalls and monitoring) are in place to minimise access and to highlight any person or child accessing inappropriate sites or information.

The police will be involved and advice will be sought from CEOP if required if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

Use of mobile phones, cameras and other devices

Unauthorized or secret use of a mobile phone or other electronic devices, to record voice, pictures or video is forbidden. Unauthorized publishing of such materials on a website which causes distress to the person(s) concerned will be considered a breach of school discipline, whether intentional or unintentional. The person responsible for the material will be expected to remove this immediately upon request and appropriate procedures will be followed. Where any crime may have been committed the police will be informed.

We recognize that many aspects of the curriculum can be enhanced by the use of multi-media and that there are now a wide and growing range of devices on which this can be accomplished. Digital images, video and sound recording are only taken with the permission of participants; images and video are of appropriate activities and are only taken of children wearing appropriate dress. Full names of participants are not used either within the resource itself, within the file-name or in accompanying text online.

All Parents & Visitors are asked not to use mobile phones when visiting our school and to take any calls or texts outside of the building or in designated areas where there is no access to pupils. All staff must be vigilant and remind any parents / visitors who forget.

We ask all parents/carers to sign an agreement about taking and publishing photographs and video of their children and this list is checked whenever an activity is being photographed or filmed.

For their own protection staff or other visitors to school never use a personal device (mobile phone, digital camera or digital video recorder) to take photographs of pupils.

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain locked away during contact time with pupils between 9.00am - 12.00pm and 12.45pm – 3.45pm when children are present. If staff need to be contacted for personal reasons such as a family emergency during the school day, staff must ensure that the schools main phone number is given out for emergencies.

Staff will not take pictures or recordings of pupils on their personal phones or cameras. We will follow the Data Protection Act 1998 when taking and storing photos and recordings for use in the school.

Staff are not permitted to use electronic devices, other than those authorised by the headteacher, within school. This includes the use of devices which transfer information including memory sticks and portable hard drives.

Use of technology to record special events

We understand that parents like to take photographs or video recordings of their children taking part in special events. We do not discourage parents from celebrating their children's success. The School does not permit the use of mobile phones in any area of the School where children may be/are present with the exception of during special events such as graduation ceremonies or Christmas performances. Permission to use mobile phones during these events will be clearly notified to parents.

The School cannot be held accountable for photographs or video footage taken by parents or members of the public at School events or when children are off-site on visits to public

spaces however parents are asked to not publish other children's images on social network sites.

Monitoring policy and practice

Our Safeguarding policy and procedures will be reviewed annually or sooner if required. All staff and stakeholders may contribute to the development of our policies and procedures. Our policy will be published on our website and paper copies are available upon request.

Reviewed: 13th October 2017

Full Governing Board Approval: 17th November 2017

Appendix 1 - Contact Information

Role/Agency	Name	Telephone	E-mail
Headteacher	Emma Smith	01902 556491	bilstonnurseryschool@wolverhampton.gov.uk
Designated Safeguarding Lead DSL	Emma Smith	01902 556491	bilstonnurseryschool@wolverhampton.gov.uk
Deputy DSL's	Lyanne Ellitts	01902 556491	lellitts@bilstonnurseryschool.co.uk
	Wendy Binder	01902 556491	wbinder@bilstonnurseryschool.co.uk
Chair of Governors	Kath Rogers	c/o Bilston Nursery 01902 556491	
Safeguarding Governor	Peter Prescott	c/o Bilston Nursery 01902 556491	
Looked after Children Lead	Lyanne Ellitts	01902 556491	lellitts@bilstonnurseryschool.co.uk
E-Safety Lead	Emma Smith	01902 556491	bilstonnurseryschool@wolverhampton.gov.uk
MASH	Social Care	01902 555392	
Social Care out of hours	Social Care	01902 552999	
Children's Disability Team	Social Care	01902 550911	childrenandyoungpeople's.disabilityservice@wolverhampton.gov.uk
Designated Officer/LADO	Paul Cooper	01902 550661	Paul.Cooper@wolverhampton.gov.uk
Prevent Counter-Terrorism Team (CTU)	PCs Holder, Nixon and Hall	101 opt 3 871 3036	
FGM	Police	101 or 999	
Police	Police	101 Option 3 for WMP or 999	
Wolverhampton Virtual School Head*	Darren Martindale	01902 551039	Darren.Martindale@wolverhampton.gov.uk
Wolverhampton CSE Lead	Sandeep Gill	01902 550477	

Appendix 2: Safer recruitment and DBS checks – policy and procedures

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

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

Disqualification Checks

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

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

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

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

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:

- Ensure volunteers working within the School will be supervised by a member of staff at all times when in contact with children
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

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

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

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

Suspension

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the

allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible the local authority will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.