

The Rutland Learning Trust

Providing outstanding education for all pupils – today and tomorrow!

First-class education and care that allows every child to achieve their potential, regardless of location, prior attainment or background.

By...

Working Together

Sustaining Excellence

Transforming Learning

Safeguarding Policy 2019/20



Uppingham C of E Primary School



WHY IS THIS POLICY REQUIRED?

Statutory Requirement

WHAT CHANGES HAVE BEEN MADE?

Updated to reflect changes in Keeping Children Safe in Education (2019) and Working Together to Safeguard Children (2018)

Keeping Children Safe in Education (2019)

4 key actions for schools to take

- Include **upskirting** and **serious violent crime** in safeguarding training in September 2019
- Carry out **section 128** checks on school Governors and Trustees
- Know and follow the **new local arrangements** set by your safeguarding partners
- Use the Department for Education's (DfE) new **online safety guidance**

Part 1 - information for all staff

All staff working in schools are required to read at least part 1 of [Keeping Children Safe in Education](#) (KCSIE).

Main changes to part 1.

Upskirting is now a form of peer-on-peer abuse

It's a criminal offence and is now listed in paragraph 27.

Definition: upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

New information on serious violent crime (29-30)

The new text says that all staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

Part 2 - the management of safeguarding

This is for headteachers, designated safeguarding lead (DSL) teams and governors.

Multi-agency working (68-75)

Changes to this section are to clarify the expectations for all agencies, including schools, in the context of the phasing out of local safeguarding children boards (LSCBs). Specifically that:

- The new safeguarding partners and child death review partner arrangements must be in place by 29 September 2019
- Schools should be aware of and follow these new local arrangements - this includes your senior leadership team, DSL and governing board

Our 3 safeguarding partners are:

- Local authority (LA), Clinical commissioning group within the LA, Chief office of police within the LA.

Reference to new relationships, health and sex education - mandatory from September 2020

Part 3 - safer recruitment

- Maintained schools should carry out section 128 checks on their governors
- Associate members don't need to have an enhanced DBS check
- [Teaching online safety in schools.](#)

WHAT IS THE IMPACT OF THIS POLICY:

Ensures all schools follow latest guidance and compliance regulations to Safeguard all our children.

DATE: September 2019

REVIEW DATE: September 2020

Contents

Contact Details for Reporting Safeguarding Concerns	5
Key Principles of Safeguarding	7
Abbreviations Used in this Document	8
1. Policy Statement	9
1.1 Who does this policy apply to?	
1.2 What is Child Protection and Safeguarding?	
1.3 Core Principles	
1.4 Extended School Activities	
1.5 Related documentation	
2. Roles and Responsibilities	11
2.1 The Designated Safeguarding Lead (DSL) and Deputy DSL	
2.2 The Headteacher	
2.3 Employees and volunteers	
2.4 Governors/Trustees	
2.5 The Designated Safeguarding Trustee	
3. Records, Monitoring and Transfer	14
3.1 Maintaining records	
3.2 Confidentiality of records	
3.3 Data Protection and Right of Access to Records	
3.4 Transfer of records	
4. Safer Recruitment	15
5. Training and Induction	16
6. Staff Conduct	16
7. Reporting Concerns about Children	17
7.1 Reporting concerns	
7.2 What to do if a child makes a safeguarding disclosure	
7.3 Responding to sexting incidents	
7.4 Action by the DSL following a safeguarding disclosure	
7.5 Support for pupils involved in a child protection issue	
7.6 Notifying parents	
7.7 Confidentiality following an Allegation	
7.8 Private Fostering	

8. Reporting Concerns About Staff	24
8.1 Duty to report concerns	
8.2 Procedure for reporting concerns	
8.3 Actions where an allegation is substantiated	
9. Reports to Regulatory / Advisory Bodies	25
10. Early Help	26
11. Children Who May Be Particularly Vulnerable	27
11.1 Children Needing Special Consideration	
11.2 Children With Special Education Needs And Disabilities	
12. Peer on Peer Abuse	28
12.1 Peer on Peer Abuse	
12.2 Bullying	
12.3 Peer on Peer Sexual Violence and Harassment	
13. Helping Children Keep Themselves Safe	28
13.1 Creating A Safe Culture	
13.2 Safeguarding within the Curriculum	
13.3 E-safety	
14. Photography and Images	28
15. Other Relevant Policies	29
16. Policy Review Process	30
Appendix 1: Understanding abuse and neglect	32
1. Types of abuse and neglect	
2. Signs of abuse and neglect	
Appendix 2: Specific Safeguarding Issues	34
Appendix 3: Staff Code of Conduct with Pupils	38
Appendix 4: Role and responsibilities of the DSL	40
Appendix 5: Related documentation/links	42
Appendix 6: Cause for concern form	45
Appendix 7: Section 128 information for schools	47

Contact Details for Reporting Safeguarding Concerns

Contact details can sometimes change between revisions of this policy.

If you think a child is in immediate danger, call the police on 999.

Contacts Within School

Nominated Trustee for Safeguarding	James Saunders jbjs@uppingham.co.uk 820731 (office) 07522 237750 (work mobile)	<i>To report concerns about the Headmaster, or about the School's safeguarding practices</i>
Designated Safeguarding Lead (DSL)	Mrs Julia Exton - Headteacher	<i>To report concerns about pupils or to ask advice</i>
Deputy DSL	Mrs Emma Keegan – SENDCo Mrs Michelle Blackford – ELSA	
Chair of Governors	Mrs Liz Clarke 07702 563211	

Contacts Outside School

Rutland Social Services RAIS Team	01572 758 407 ChildrensReferrals@rutland.gcsx.gov.uk	<i>Referrals to Social Services. Office hours only</i>
Social Services Out Of Hours Service	0116 305 0005	<i>Emergency referrals that cannot wait until the next working day</i>
Rutland Local Authority Senior Officer	Cathy Smith (Head of Childrens Social Care) 01572 758859	
Rutland Local Authority Designated Officer (LADO)	Tracy Holliday 01572 720 913 safeguardingunit@rutland.gcsx.gov.uk	<i>To make a referral relating to concerns about a member of staff</i>
School Inclusion Development Officer	Liz Odom	<i>For pupil attendance concerns</i>
Early Help	01572 758407 EarlyHelp@rutland.gcsx.gov.uk	
Virtual Head for Looked After Pupils	Helen Bushell 01572 758213	
Leicestershire Safeguarding Children's Board	http://lrsb.org.uk http://lrsb.proceduresonline.com/index.htm	<i>For safeguarding information and advice and link to LRSB procedures manual</i>
NSPCC Whistleblowing Helpline	https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/ 0800 028 0285 help@nspcc.org.uk	<i>To report any safeguarding concern that you do not feel confident reporting within the School</i>
Government Forced Marriage Unit	020 7008 0151 fm@fco.gov.uk .	<i>To report concerns that a child is at risk of forced marriage</i>
Leicestershire Prevent Programme	0116 248 6726 preventengagement.team@leicestershire.pnn.police.uk .	<i>To make a direct referral to the Prevent programme</i>
UAVA Professionals Advice	0116 255 0004	<i>For advice on supporting victims of domestic abuse or sexual violence</i>
CAMHS Advisory Service for Professionals	0116 295 5048 (8.30 a.m. – 3.00 p.m.)	<i>For advice on mental health issues from CAMHS professionals</i>

Rutland Learning Trust Key Principles of Safeguarding

All our schools are committed to safeguarding and promoting the welfare of children and young people regardless of age, ability, race, culture, religion, sexuality or class. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.

The RLT therefore expects all staff, Trustees, volunteers and parents to share this commitment.

Our five guiding principles are:

1. Nothing Is More Important Than Keeping Children Safe.

Safeguarding comes before anything else, including GDPR.

2. Everyone Has A Part To Play.

It is the job of every member of staff to play their part in making our school communities a place where young people are safe.

3. Everyone Must Be Vigilant.

Much though we want to believe that other people are well-intentioned, we cannot be complacent. We know 'it could happen here.'

4. Everyone has An Absolute Duty To Report Concerns And Ensure They Are Acted Upon.

This is a moral, professional and legal duty.

5. Concerns Must Be Reported Immediately.

If we notice something that worries us, we must not delay in reporting it.

Staff with safeguarding responsibilities MUST read – and understand their obligations as described in the documents below.

These documents will be in our safeguarding file and/or on the school intranet.

[Keeping children safe in education September 2019 \(KCSIE\): Statutory guidance for schools and colleges](#)

This document sets out the responsibilities placed on schools and colleges to safeguarding and promote the welfare of children.

[Working together to safeguard children 2018](#)

This document applies to organisations and professionals who provide services to children.

[Prevent duty guidance for England and Wales](#)

This is guidance for specified authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the needs to prevent people from being drawn into terrorism

Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings 2019

Safeguarding and Child Protection information

The school's behaviour management policy.

The school's Prevent Policy and Strategy.

Abbreviations Used In This Document

CPD	Continuing Professional Development
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service <i>The government agency which checks applications to work with children against convictions and police intelligence, to ensure applicants are fit to safe with young people. Used to be called CRB (Criminal Records Bureau).</i>
DfE	Department for Education
DSL	Designated Safeguarding Lead. <i>The person with ultimate responsibility for safeguarding in the school.</i>
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulation (2018)
HBV	Honour-Based Violence
HR	<i>Human Resources Department</i>
KCSIE	Keeping Children Safe in Education <i>The government document which outlines schools' safeguarding responsibilities.</i>
LAC	Looked After Child <i>Child who is under the care of the Local Authority.</i>
LADO	Local Authority Designated Officer <i>A safeguarding officer at the Local Authority who provides guidance to schools managing concerns about members of staff.</i>
NSPCC	National Society for the Prevention of Cruelty to Children
RAIS	Referral, Assessment and Intervention <i>The 'front door' of Social Services: the team which receives and assesses all new referrals.</i>
RLT	Rutland Learning Trust
SEN	Special Educational Needs
YPSI	Youth Produced Sexual Imagery

1. Policy Statement

1.1 Who does this policy apply to?

Safeguarding is the individual responsibility of everyone, and everyone has a part to play. Duties outlined in this policy apply to every adult employed by the school, and to anyone working on school premises. This includes Trustees, visitors and unpaid volunteers. The policy also applies to activities operated by Sports providers, peripatetic teaches, before and after school clubs and catering staff.

The policy will be available on the School website for anyone who wishes to view it.

1.2 What is Child Protection and Safeguarding?

When we talk about **safeguarding**, we mean things which promote children's welfare and reduce the risk of them suffering harm. This includes

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring children grow up with safe and effective care;
- Taking action to enable all children to have the best outcomes.

(Working Together to Safeguard Children: 2019)

Child Protection is a part of safeguarding.

It means actions which aim to protect children who could suffer significant harm.

1.3 Core Principles

While we would like to think that all young people are loved, cared for and supported by the people around them, we know this is not always the case. In working with children, we will always be mindful of the possibility that *'it could happen here'*.

There are four key elements to this policy:

- **Prevention.** We will provide an environment where children feel secure, are encouraged to talk, and are listened to. We will raise awareness of safeguarding issues and equip children with skills they need to keep them safe. When appointing staff and volunteers, we will practise safer recruitment procedures.
- **Protection.** We will ensure all staff and volunteers have an up-to-date DBS check, know their safeguarding responsibilities, and are supported to respond appropriately to safeguarding concerns. We will ensure that contractors and other visitors are appropriately supervised at all times, and have DBS clearance where this is deemed necessary.

- **Support.** We will provide support for children who are at risk of harm or have suffered abuse, in accordance with their agreed safeguarding plan.
- **Working with others.** We will ensure every effort is made to establish effective working relationships with parents, guardians and colleagues from the three safeguarding partners (Local Authorities, clinical commissioning groups and the police) and other agencies.

In our efforts to safeguard and promote the welfare of children, the school takes account of the most recent legislation and guidance and operates within locally-agreed inter-agency procedures.

Our school endeavours to apply the insights of a contextual safeguarding to its practice. Contextual safeguarding is a model which recognises that children's lives are shaped by multiple contexts, of which school is only one. In responding to the child's needs, we must therefore understand not only their experience in our school, but also the family, friendship, neighbourhood, and online 'worlds' they inhabit."

1.4 Extended School Activities

Where the Governing Body provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the Governing Body will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the school on these matters where appropriate.

1.5 Safeguarding in the Curriculum

Children are taught about safeguarding in school. The following areas are among those addressed in PSHE and the wider curriculum:

Bully/Cyberbullying

Internet Safety (E-Safety) **Use the Department for Education's (DfE) new online safety guidance**

Stranger Danger

Fire and Water Safety

Road Safety

Healthy relationships/Sex education

Where age appropriate, Honour Based Violence, Female Genital Mutilation, Forced Marriage, Radicalisation etc.

1.6 Related Documentation

This policy is only part of the School's efforts to keep children safe. It should be read alongside relevant legislation, statutory guidance and best-practice advice, and the School's internal policies.

The most important of these documents are listed in Appendix 5.

2. Roles and Responsibilities

2.1 The Designated Safeguarding Lead (DSL) and Deputy DSL

Each school has appointed a person and deputy with primary responsibility for Child Protection and Safeguarding matters.

DSL - Mrs Julia Exton – Headteacher

Deputy DSL – Mrs Emma Keegan (SENDCo) and Mrs Michelle Blackford (ELSA)

The Deputy DSLs are trained to the same level as the DSL. The DSL or Deputy DSL is the first point of contact for all matters of child protection. All concerns and queries must be reported to them.

The role of the DSL is described in Annex B of [KCSIE](#) and focused on five broad areas:

- *Managing Referrals.* Receiving, assessing and acting on reported concerns.
- *Working with others.* Acting as the first point of contact and main liaison, within the School and for external agencies.
- *Training.* Ensuring all staff are kept up to date on safeguarding issues and the School's procedures for dealing with them.
- *Raising Awareness.* Ensuring safeguarding has a high profile within the School and everyone understands its importance.
- *Record-Keeping.* Ensuring all Child Protection files are maintained to a high standard and transferred when a child leaves the school.
- *Advice.* Being a source of expert advice and support for staff on safeguarding matters.

A detailed description of the DSL's role is given in Appendix 4.

2.2 The Headteacher

The Headteacher, either in person or by delegation, will:

- Ensure this policy is implemented by all staff.
- Inform all parents of this policy.
- Allocate sufficient time, training and resources to enable the DSL to carry out their role effectively.
- Foster a culture where all staff feel able to raise concerns about poor practice; and ensure that any concerns are handled sensitively and in accordance with whistleblowing procedures.
- Ensure pupils have regular opportunities to learn about safeguarding, including keeping themselves safe online.
- Ensure a child's wishes are taken into account when determining action to be taken.
- Liaise with the LADO where an allegation is made against a member of staff.
- Ensure that anyone who has harmed, or poses a risk to, a child is referred promptly to the DBS, where they were, or could have been, dismissed due to safeguarding concerns. Also, that prompt referral is made to the Teaching Regulation Agency and other regulatory / advisory bodies, if appropriate.

To enable him/her to fulfil these responsibilities, the Headteacher is trained to the same level as the DSL.

2.3 Employees and Volunteers

Everyone who works with children at our schools has a role to play in keeping them safe. It is the responsibility of every employee and volunteer to

- Act at all times in the best interests of the child.
- So far as possible, protect children from abuse and neglect.
- Provide a safe environment for children to live and learn.
- Be vigilant in protecting the welfare of children, and constantly aware 'it could happen here'.
- Complete induction in child protection at the start of their RLT career.
- Read at least part one of [KCSIE](#).
- Read the School's Safeguarding (Child Protection) policy annually, and sign an acknowledgement that they have done so.
- Undertake child protection 'refresher' training at three-yearly intervals.
- Receive safeguarding and child protection updates as required, but at least annually.
- Be aware of the signs of abuse and neglect so they can identify children at risk of harm.
- Be aware of the School's child protection procedures, and follow them.
- Know how to implement child protection procedures independently, if necessary.
- Be aware of the early help process.
- Keep an adequate record of any significant complaint, conversation or event.
- Promptly report any matter of concern (including concerns about the conduct of another member of staff), following procedures outlined in this policy.
- Make a direct referral to Social Services and / or the police themselves immediately if they fear there is a risk of imminent serious harm.

2.4 Local Governing Body

The Rutland Learning Trust delegates its responsibilities for all safeguarding to the Local Governing Bodies. The responsibilities of the Local Governing Body are extensive, and so given only in outline here. A full description is found in Part 2 of [KCSIE](#).

Through regular and rigorous monitoring, the LGB through the Designated Safeguarding Governor will:

- Ensure appropriate safeguarding policies and procedures are in place.
- Confirm that a senior member of the School leadership team has been appointed the role of DSL.
- Ensure the School contributes to inter-agency working, in line with statutory guidance.
- Confirm all staff members undergo safeguarding and child protection training at induction.
- Confirm the School has appropriate filters and monitoring systems to keep children safe online.
- Check children are taught about safeguarding, including safety online.
- Ensure the School follows safer recruitment practices to prevent people who pose a risk of harm from working with children.
- Ensure there are procedures in place to handle allegations against staff, and that a referral to the DBS is made if a person in regulated activity has, or could have been, dismissed due to safeguarding concerns.
- Ensure their child protection policy includes procedures to deal with peer on peer abuse (including sexting) and any associated gender issues.

- Ensure children’s wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure the welfare of pupils who are, or have ever been, Looked After Children is assured and their educational achievement promoted by a designated teacher.
- Ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities.
- Liaise with the DSL.
- Undertaking training for Nominated Safeguarding Governors, and being familiar with current safeguarding regulations.
- Undertaking an annual review of safeguarding and child protection to assure LGB/Trustees that pupils are safe, regulatory requirements met, and any necessary improvements implemented.
- Producing an annual report for LGB which outlines the adequacy of policies and their implementation, and recommends improvements. The report will cover,
 - The effectiveness of relevant procedures and their implementation.
 - Adequacy of staff training and training records, including those for the DSL.
 - The handling of safeguarding issues dealt with during the year.
 - The adequacy of training and resources for the DSL.
 - Referral information in requests for help and support for individual children.
 - The School’s contribution to inter-agency working.
- Liaison, under delegation from the Chair of Trustees, with the LADO and partner agencies, in the event of allegations made against the Headteacher or a Trustee.

The LGB will receive and discuss the Safeguarding Governor’s annual report, and ensure that adequate minutes of the LGB’s review are recorded.

2.5 The Designated Safeguarding Trustee

The RLT nominated Trustee is **James Saunders**.

The Trust Board through the Safeguarding Trustee will ensure:

- All schools have a culture in which safeguarding is given absolute priority and staff feel confident to report their concerns.
- Safeguarding is given appropriate priority and time on the Trust Board’s annual agenda.
- The ‘Annual Report to Members and Trustees’ will include a statement on the impact of the safeguarding procedures used across the Trust.
- The Trust Safeguarding policy, procedures and quality assurance activities are reviewed annually.
- There is rigorous and effective monitoring of safeguarding by all LGBs – a part of the Leadership Reports to LGB and the Trust Board.
- There is a consistent approach to policy development, dissemination and training across all the Trust’s schools.
- Safeguarding risks are rapidly identified and addressed in the Trust’s schools.
- Head teachers / DSLs act as ‘critical friends’ to one another and regularly share best practice.
- Information on safeguarding failures, ‘near misses’ and serious incidents are reported to the Trust Board and used to identify areas where safeguarding needs strengthening.
- Schemes of Delegation and Trust policies reflect best practice and identify clear lines of accountability.

3. Records, Monitoring and Transfer

3.1 Maintaining Records

Schools are to ensure that more than one parent/carer contact number is held for each child with additional options for children identified as a concern, particularly any who go missing.

Well-kept records are essential to good child protection practice. All safeguarding concerns and discussions, along with decisions and the reasons for them, must be recorded in writing. All staff must be clear about the need to record and report concerns about a child. If in doubt, staff should discuss with the DSL.

Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints / concerns about any individual, and ensuring these are acted upon.

Records are retained by the school in line with guidelines issued under local multi-agency arrangements.

3.2 Confidentiality of Records

The School keeps any paper records in a secure location and digital records under conditions of equivalent security. Safeguarding files are stored separately from other pupil or staff records. Access is restricted to specific staff with a need to see them, such as the DSL, Deputy DSLs, headteachers and external professional agencies.

3.3 Data Protection and Right of Access to Records

Data protection legislation is not a barrier to sharing information, where failure to do so would result in a child being placed at risk of harm. Concerns for confidentiality and fears about sharing information should not be allowed to stand in the way of the need to promote the welfare of children.

The General Data Protection Regulation (GDPR) and Data Protection Act (2018) applies to safeguarding records as much as any other personal data that the school may hold. It places duties on the School and the individuals it employs to process personal information in a fair, lawful and transparent manner. Safeguarding information should only be collected where there is a legitimate reason to do so (in this case, the protection of pupils from harm) and used only for that purpose. Records should be kept as accurate and up-to-date as possible, and retained only for as long as there is a justifiable reason to do so.

In general, data should only be processed with the consent of the individual it concerns. However, it may be lawful to do so without consent where this is necessary to protect an individual from neglect, physical, mental or emotional harm; or protect the physical, mental or emotional well-being of an individual. Safeguarding records can, therefore, be maintained even without an individual's consent being obtained.

The School works on the general principle that individuals have a right to see records relating to them. If pupils (over 13 years of age) request access to their own safeguarding file, correction or deletion of any information which they contain, the DSL will take this general right of access into account when deciding whether to release the file. However, this general right of access may be restricted if, in the judgement of the DSL, release of the file may put the pupil or any other individual at risk of harm. In some cases, it may be appropriate to release the file in an edited or redacted format. Where parents request access to their children's safeguarding records, the DSL will further take into account the age of the pupil concerned and the fact that the data strictly belongs to the child and not the parent.

Our school may share information with external professional agencies (e.g. police, medical or social workers) when it is in the best interests of the child to do so.

3.4 Transfer of Records

When a pupil transfers from our school to another school, their Child Protection Record is forwarded to the new school without delay. If the pupil is the subject of a Child Protection Plan, the child's social worker is informed. Relevant safeguarding information should be shared in advance of new children arriving at the school if they need continuing support e.g. in response to sexual abuse.

Safeguarding records will be transferred separately from other records and, wherever possible, passed directly to the DSL of the receiving school and a signed, dated record of the transfer obtained. In the event of a child moving out of area and a physical handover not being possible, the most secure method will be found to send the confidential records to a named DSL, and a copy kept at the pupil's current school until safe receipt is confirmed. Files requested by other agencies (e.g. police) will also be copied.

4. Safer Recruitment

Under no circumstances should a volunteer in respect of whom no checks have been obtained ever be left unsupervised or allowed to work in regulated activity.

The School is committed to safer recruitment, ultimate responsibility for which lies with the Local Governing Body. We will ensure that we practise safe recruitment by checking the suitability of staff, volunteers and Governors (including staff employed by another organisation) to work with young people, in accordance with the latest regulations and guidance. Checks will include contacting The Teaching Regulation Agency to check staff and governors against the s128 prohibition list.

The Headteacher and HR providers are responsible for implementing these procedures in practice. The School's Safer Recruitment policy and Safeguarding Handbook give further details.

All necessary checks will be carried out on the suitability of people who serve on the School's governing body, in accordance with regulations and guidance given in [KCSIE](#).

5. Training and Induction

It is important that all staff have training to help them recognise possible signs of abuse and neglect and know what to do if they have a concern. The school aims to provide staff with comprehensive training on safeguarding matters, including online safety and the Prevent duty.

The DSL, working together with the Headteacher, ensures all staff receive appropriate safeguarding training as part of their induction programme, including the school's behaviour policy and children missing education guidelines.

Thereafter, all staff are required to undergo refresher training every three years. On top of this, all staff receive safeguarding updates as part of their CPD (at least annually on a formal basis, and through regular, informal updates as required). A copy of this Safeguarding Policy is held within the school office and on the school website. The DSL and Deputy DSL attend appropriate training for their role and a one-day refresher every two years, in order to remain fully up-to-date. They also ensure that they receive regular updates throughout the year, and keep themselves abreast of changes and developments.

6. Staff Conduct

The school has a duty to ensure that relationships between staff and children are conducted in a professional manner at all times, and that all staff are clear about what constitutes appropriate behaviour and boundaries. As well as keeping children safe, this also ensures that actions by members of staff are not misinterpreted. Useful advice can be found in the School Staff Code of Conduct with Pupils (see Appendix 3), and [Guidance For Safer Working Practice For Those Who Work With Children In Education Settings](#).

All staff should be aware of the dangers inherent in:

- Working alone with a child.
- Physical interventions.
- Cultural and gender stereotyping.
- Dealing with sensitive information.
- Giving to, and receiving gifts from, children and parents.
- Contacting children through private telephones (including texting), email or social networking sites.
- Disclosing personal details inappropriately.
- Meeting pupils outside school hours or school duties.
- Making inappropriate sexual comments.
- Excessive one-to-one attention, beyond the normal requirements of the role.
- Inappropriate sharing of images.

7. Reporting Concerns about Children

7.1 Reporting Concerns

All members of staff have an absolute duty to report any safeguarding concerns they have without delay. The DSL / Deputy DSL can be contacted by email, telephone or in person.

If staff have a concern, they should follow the Safeguarding Policy and speak to the designated safeguarding lead (or deputy).

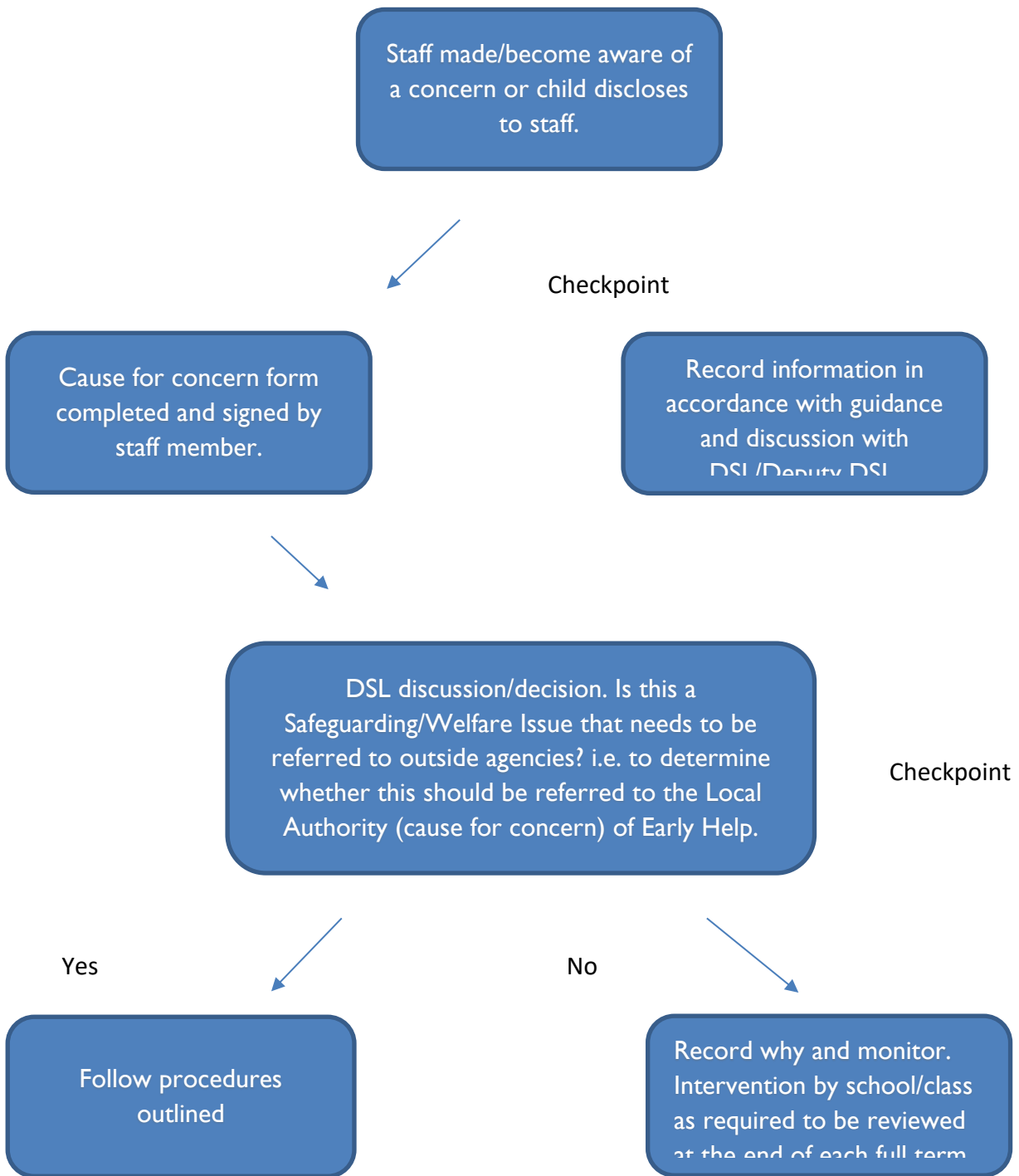
There will be occasions when staff suspect that a child may be at risk, but have no definite evidence to support this suspicion. In these circumstances, staff are encouraged to give the child opportunity to talk, and ask them if they need any help. Staff are strongly encouraged to record these early concerns and report them immediately.

If there is a risk of immediate serious harm to a child, a referral must be made to Children's Services (or the police, if a crime has been committed) immediately. Anybody can make a referral, and staff must do so themselves if the DSL is not quickly available.

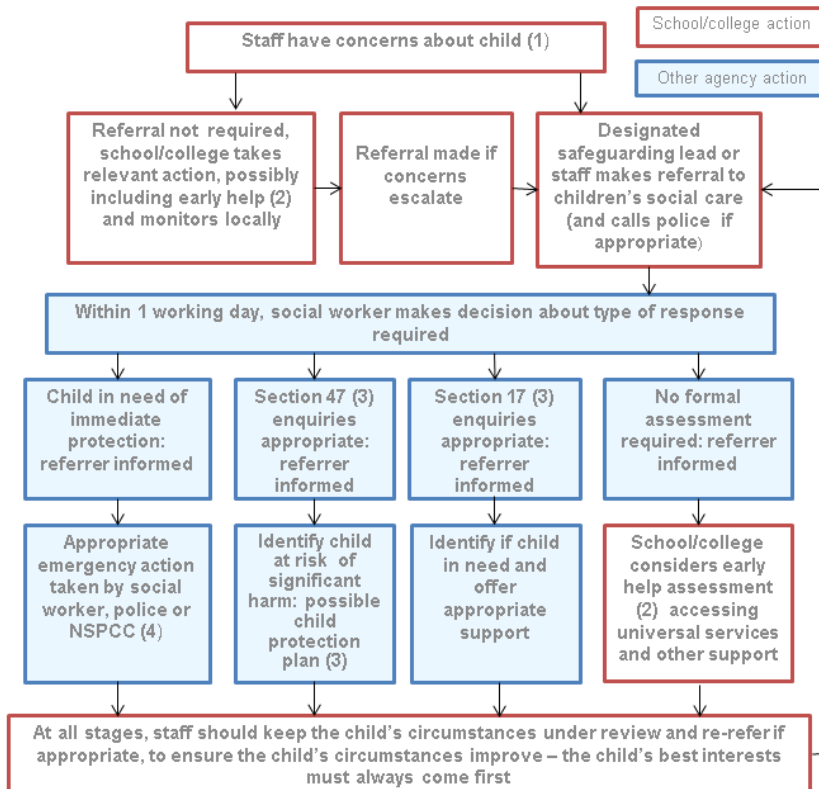
If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible. This includes any referrals made in an emergency.

While the school will normally make every effort to involve parents in matters relating to their child, parental consent is not required for referral to statutory agencies. Members of staff must act at all times in the best interests of the child. On the rare occasions where it is reasonably believed that informing parents might increase the risk faced by the child, or if parents seek unreasonably to obstruct / delay referral, the school will make the referral without parental consent.

Disclosure Flow Chart



Actions where there are concerns about a child



Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation. The online tool 'Report child abuse to local council' directs you to the relevant children's social care contact number. www.gov.uk/report-child-abuse-to-local-council

7.2 What To Do If A Child Makes A Safeguarding Disclosure

If the child does reveal that they are being harmed, or are at risk of significant harm you should:

- Listen carefully to the child and keep an open mind. Staff should not make a decision about whether or not they think the abuse has taken place.
- Allow the child to speak freely and do not ask leading questions (that is, a question which suggests a 'correct' answer).
- Remain calm and do not overreact. The child may stop talking if they feel they are upsetting you.
- Reassure the child but do not give a guarantee of absolute confidentiality. Where possible, seek the child's consent about which individuals or agencies need to be informed. The member of staff should explain that they need to pass the information to the DSL, who will ensure that the correct action is taken.
- Keep a sufficient written record of the conversation and preserve any evidence (for example, scribbled notes, text messages, etc.). Best practice suggests you should not write any notes while the pupil is speaking. Write up notes immediately after the meeting. If an aide-memoire is required, only very brief phrases or notes should be jotted down – the priority is to listen, not to write down everything that is said, and the writing of notes may lead a pupil to clam up. The record should include the date, time and place of the conversation and the 'who, what, when and where' of the allegation. The record should be signed by the person making it and use names, not initials. The record must be kept securely and handed to the DSL /Deputy DSL at the first opportunity.
- Report details of the conversation to the DSL / Deputy DSL.
- Seek support if you feel distressed.
- Never start your own investigation.
- Share information on a need-to-know basis only. Do not discuss with colleagues, friends or family.

All staff have a 'duty to persist' in ensuring a safeguarding matter is dealt with appropriately. The member of staff making the initial referral should expect to be informed that action has been taken by the DSL. If no communication from the DSL is made within 48 hours of the referral, the member of staff should make further contact. If the member of staff still feels that the DSL has not responded to the concern appropriately, they must go directly to Children's Services.

7.3 Responding to 'Sexting' Incidents

In responding to incidents of sexting, the school will act in accordance with advice endorsed by the Department for Education and published as:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

Key points to note are:

- All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns and must be reported to the safeguarding team without delay, even if the imagery seems to have been produced consensually.
- If staff become concerned about a YPSI issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff should confiscate the device and pass it immediately to the DSL. Staff must not ask to see, look at, print or forward any indecent images.

After receiving a report of a sexting incident, the DSL will consider next steps. Before making a decision to view imagery, the DSL must be satisfied that this:

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

In such cases, the DSL will gain authority from the Headteacher and Children's Social Services and will ensure viewing takes place with another senior member of staff present in the room (who does not need to view the images). Wherever possible, images will be viewed by a staff member of the same sex as the young person in the imagery. Viewing will be recorded in the pupil's safeguarding file, including details of who was present, why the image was viewed and any subsequent actions.

Young people who share sexual imagery of themselves or their peers are breaking the law. However, it is important to avoid criminalising young people unnecessarily. The school will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident. The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/guardians will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to Social Services and / or the police. The Police will always be informed when there is reason to believe that images involve sexual acts and any child in the imagery is under 13 years of age; if there is suspicion of adult involvement; or criminal / abusive behaviour such as sexual abuse, extortion, threats, or sending / showing of images without the knowledge / against the will of a young person who is pictured.

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

7.4 Action By The DSL Following A Safeguarding Disclosure

DSL action will be taken as soon as possible and take into account:

- [Procedures of the Leicester, Leicestershire and Rutland Safeguarding Children Board](#) (or other relevant local multi-agency arrangements, depending upon the pupil's home address).
- The nature and seriousness of the suspicion or complaint. A complaint involving a criminal offence will always be referred to Children's Services and the police, without investigation within the School;
- The wishes of the pupil, provided he / she is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions need to be taken that override a pupil's wishes.
- The wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, he will take further advice from relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of the School community as a whole, including its employees, while recognising that the interests of the child are, in all circumstances, the primary consideration.

Where appropriate, the DSL will ensure that the child is kept informed of what is being done. The DSL will also inform the member of staff making the initial referral that action has been taken.

If there is room for doubt as to whether a referral should be made, the DSL may consult with the LADO or other appropriate professionals on a 'no-names' basis, without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within one working day, the DSL will contact Social Services again.

If, after a referral, the child's situation does not appear to be improving, the DSL (or person who made the referral) should press for re-consideration to ensure concerns are being addressed and the child's situation improves.

All concerns, discussions and decisions made, and the reasons for them, should be recorded in writing.

PRIVATE FOSTERING. A private fostering arrangement is one that is made without the involvement of a local authority for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. When the School is made aware of such an arrangement, it is under a duty to report this to the child's local authority. This report will be made by the Designated Safeguarding Lead.

Further information can be found in the [Replacement Children Act \(1989\) Guidance on Private Fostering](#). "

7.5 Support For Pupils Involved In A Child Protection Issue

Abuse is devastating for a child and can result in significant distress and anxiety. Our school will support pupils by:

- Taking all concerns, suspicions and disclosures seriously.
- Carefully following the School's own policies and procedures.
- Ensuring regular communication between School and home to keep all parties informed.
- Offering details of helplines, counselling or other avenues of support.
- Responding sympathetically to any request for time-out to deal with distress or anxiety.
- Maintaining confidentiality, and sharing information on a need-to-know basis, only with relevant individuals / agencies.
- Storing records securely.
- Cooperating fully with statutory agencies.
- Ensuring that any approach to safeguarding and promoting the welfare of children is child-centred and in the best interests of the child.

7.6 Notifying Parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will normally make contact with the parent in the event of a suspicion, concern or disclosure. Parents or carers should also normally be kept informed about the progress of a case, and told the outcome where there is not a criminal prosecution.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Social Services. Where a strategy discussion is required, or police / Children's Services need to be involved, those agencies should be consulted before information is disclosed to parents. If the allegation involves a member of staff, parents should only be informed with the LADO's consent. For the avoidance of doubt, referrals to Social Services or the LADO do *not* require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

7.7 Confidentiality following an Allegation

Staff can never give absolute guarantees of confidentiality to pupils or adults wishing to tell them something serious. However, they should only pass information to the minimum number of people necessary to ensure that proper action is taken. Staff must never tell anyone who does not have a clear 'need to know', and should take whatever steps they can to protect the informing pupil / adult from any retaliation or unnecessary stress that could result from the disclosure of alleged abuse.

Staff must not speculate publicly about any allegation against an employee, and must not respond to any request from the media, pupils, parents or the public for statements, either written or verbal. Any such requests should be directed towards the Headteacher.

8. Reporting Concerns about Staff

8.1 Duty to report concerns

Staff should be clear that raising a concern about a colleague is not a betrayal of that colleague but part of their duty of care to a child who might be at risk. They have a professional duty to report any concerns that a colleague (including visitor or volunteer) may have harmed a child, committed a criminal offence related to a child, or behaved towards a child in a way that indicates s/he would pose a risk of harm. Staff should feel confident that any concerns they express about a colleague's conduct will be taken seriously and acted upon.

If any member of staff has reasonable suspicion that a child is suffering harm, and fails to act in accordance with this policy, it will be viewed as misconduct.

In a culture of continuous improvement, staff should feel able to use the Whistleblowing Procedure (see below, section 8.2) to raise concerns about poor practices or potential failures in the School's safeguarding regime. Such concerns will be taken seriously by the Leadership Team.

8.2 Procedure for reporting concerns

Concerns about a member of staff (including volunteer or visitor) should be reported immediately to the Headteacher. The Headteacher will inform the LADO and take appropriate advice on further action.

Where the allegation is against the Headteacher, it should be reported to the Designated Safeguarding Trustee (James Saunders) and RLT Chief Executive Officer (Robert Gooding), without the Headteacher being informed. They will inform the LADO and Chair of Trustees.

The School will not undertake its own investigation of an allegation against a member of staff without prior consultation with the LADO.

The reporting procedure should be used in all cases in which it is suspected or alleged that a member of staff (including volunteer) has:

- 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 in a way that indicates he/ she would pose a risk of harm if they work regularly or closely with children.

A member of staff receiving an allegation of abuse against a colleague must keep a sufficient written record of the conversation and preserve any evidence (for example, scribbled notes, text messages, etc.). The record should include the date, time and place of the conversation and the 'who, what, when and where' of the allegation.

If any member of staff does not feel confident to report concerns internally, or is dissatisfied with the way concerns have been addressed, they should report their concerns to the NSPCC Whistleblowing line. Our school has a published Whistleblowing Procedure which demonstrates how staff can do this without fear of reprisal. A copy of the Whistleblowing policy is available from the school office or school website.

Where an allegation of abuse against a member of staff occurs, the School has a robust procedure for dealing with it. This is sent out annually to employees under separate cover. It follows statutory guidance and is reviewed annually.

8.3 Actions where an allegation is substantiated

If an allegation against a member of staff is substantiated, consideration will be given to whether the member of staff concerned should be referred to the Teaching Regulation Agency. If so, the referral will be made as soon as possible.

A detailed report will be made to the Disclosure and Barring Service (DBS) at the earliest opportunity (and in any event, within one month) if any person (whether employed, contracted, a volunteer or student) is believed to have

- harmed, or posed a risk of harm, to a child;
- received a caution or conviction for a relevant offence
- committed a relevant offence;
- been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left the school's employment.

The School will ensure that a person who is no longer in the employment of the School does not remain in the School.

9. Reports to Regulatory / Advisory Bodies

In the event of a serious safeguarding incident, the School may have a duty to make a report to various regulatory bodies, including the Teaching Regulation Agency. This is in addition to involving the police, Social Services, and other external agencies.

Each of these bodies has its specific areas of interest (which may overlap) and their own reporting thresholds. However, the School is likely to need to report incidents such as

- Serious harm coming to a pupil who is in the School's care;
- Significant failures in safeguarding systems and processes, even if no actual harm resulted;
- Abuse or mistreatment of a pupil by someone connected with the School, or allegations / suspicion that this has occurred.

These are broad categories, and it is important that the Headteacher and DSL consider all cases individually, and ensure that a report is made to all appropriate bodies at the earliest opportunity.

10. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later.

Some children may be particularly vulnerable, and it is important that staff are particularly alert to the potential need for early help where a child

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- goes missing from school or home;
- is misusing drugs or alcohol;
- faces challenging family circumstances *e.g.* substance abuse, adult mental health problems or domestic abuse;

Effective early help relies upon local agencies working together to identify need and provide targeted support that will improve outcomes for the child. All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals, and, in some cases, acting as the lead professional in undertaking an early help assessment.

Where a child would benefit from co-ordinated early help, an inter-agency assessment should be arranged. Chapter one of [Working Together To Safeguard Children](#) provides detailed guidance on the early help process.

11. Children Who May Be Particularly Vulnerable

Some children may be at increased risk of neglect or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination; social isolation or exclusion; communication issues; and the fact that some adults are reluctant to accept abuse happens or have a high level of tolerance of neglect.

Where a child is identified as needing special consideration and attention, this will be taken into consideration and appropriate support given.

11.1 Children Needing Special Consideration

To ensure all of our children receive equal protection, we will give special consideration and attention to children who are:

- Disabled or have special educational needs (SEN);
- Young carers;
- Living in a situation of domestic abuse;
- Affected by parental substance misuse;
- Asylum seekers;
- Living permanently away from home;
- Vulnerable to being bullied, or engaging in bullying;
- Living in temporary accommodation;
- Living transient lifestyles;
- Living in chaotic, neglectful or unsupportive home situations;
- Vulnerable to discrimination on the grounds of race, ethnicity, gender, religion or sexuality;
- Involved directly or indirectly in prostitution or child-trafficking;
- Do not have English as a first language;
- Those who are, or have ever been, 'Looked After' Children, or children in care. This includes those who are subject to a care order or temporarily classed as looked-after on a planned basis for short breaks or respite care.

11.2 Children With Special Education Needs And Disabilities

Additional barriers may exist to 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 impairment without further exploration.
- The risk that children with SEN and disabilities may be disproportionately impacted by things like bullying, without showing any outward signs.
- Communication barriers and difficulties.
- Reluctance to challenge carers.
- A disabled child's lack of understanding of abuse.
- An increased risk that the child is socially isolated.

Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.

It is important that staff are aware of these barriers, and remain alert to the possibility of a child with SEN or a disability being neglected or abused.

12. Peer on Peer Abuse

12.1 Peer on Peer Abuse

It is particularly important to understand that ‘abuse is abuse’ and should never be tolerated or passed off as “banter” or “part of growing up”.

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to:

- physical abuse *e.g.* hitting, kicking, shaking, biting, hair pulling;
- sexual violence and sexual harassment
- sexting
- initiation type violence and rituals.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation (both to protect them, and to ensure fair process) and the School’s policy on behaviour, discipline and sanctions will apply.

12.2 Bullying

The School is determined that no kind of bullying will be tolerated, and victims appropriately supported. The School’s Anti-Bullying Policy is available from the school office and should be read alongside this policy. The policy takes account of the DfE guidance document, [Preventing and Tackling Bullying](#) (July 2017).

A bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In this instance, normal safeguarding reporting procedures will be followed. Where the legal threshold is met, a referral will be made to the police.

12.3 Peer on Peer Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Abusive behaviour may occur within an established relationship, or outside. Staff should be alert to harmful sexual behaviours (see Appendix 2) and seek intervention for any pupils who display them.

As part of the school's efforts to build a culture that is respectful and inclusive, staff should be confident to challenge sexist, inappropriately sexualised or intimidatory remarks which they overhear.

Behaviours such as unwanted sexual touching ('groping') will be robustly dealt with under the school's disciplinary codes, and will be reported to the police if they are considered potentially criminal in nature. If instances of online sexual harassment come to the school's attention (e.g. non-consensual sharing of sexual images or videos; inappropriate sexual comments on social media; exploitation; coercion or threats), these may also be reported to the police and / or Social Services.

Where a disclosure of sexual violence or harassment is made by a pupil, the safeguarding team will consider referral to the police or other agencies, where appropriate. In responding to the disclosure, the school will take the wishes of the pupil who made the disclosure into account, and abide by the best practice outlined in the DfE's guidance document, [Sexual violence and sexual harassment between children in schools and colleges \(December 2017\)](#). The school's response will include appropriate support for the pupil who made the disclosure. It may put in place support to allow an alleged perpetrator to address his / her problem behaviour.

13. Helping Children Keep Themselves Safe

13.1 Creating A Safe Culture

The School strives to build a strong culture in which members of the community behave caringly and respectfully towards each other. The School's pastoral systems ensure pupils receive regular guidance on how to keep themselves safe and manage risk.

The School implements clear anti-bullying policies and encourages pupils to speak to a member of staff of their choosing about any worries they may have.

To support the creation of a safe culture, the School implements clear and robust policies for issues such as bullying, drugs and e-safety.

13.2 Safeguarding within the Curriculum

The school provides a curriculum that aims to raise awareness among pupils about keeping safe, to raise self-esteem and give confidence to share concerns with adults in the school. Pupils will be helped to consider issues including

- Bullying, including cyber-bullying and prejudice-based bullying.
- Racism, disability, and homophobic or transphobic abuse.

- Radicalisation and extremist behaviour.
- Child Sexual Exploitation.
- Staying safe online.
- Sexting.
- Substance misuse.
- Domestic violence and Honour Based Violence (female genital mutilation and forced marriage), at an age-appropriate level.

13.3 E-Safety

Children are reminded regularly about e-safety (particularly sharing images and content online) and required to read, understand and sign an Acceptable Use Agreement on an annual basis in order to access the School's information technology services.

The School operates appropriate internet filters to prevent children accessing inappropriate websites through the School's computer network. Monitoring systems are also in place to alert staff to any inappropriate sites which might be being visited. Both the filter and monitoring system are regularly reviewed by the school's ICT provider, currently ARK ICT Solutions.

Further detail on the school's approach can be found in the e-Safety policy.

14. Photography and Images

The vast majority of people who take or view photographs / videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect children, we will:

- Seek their and their parents' consent for photographs to be taken or published (e.g. on our website or in newspapers or publications);
- Ensure children are appropriately dressed;
- Encourage children to tell us if they are worried about any photographs that are taken of them.

Members of staff must not take unauthorised photographs of pupils. Photographs should be the property of the School and not retained on personal equipment.

From time to time, professional photographers are invited into the School to take group photographs or pictures. Any professional photographers hired by the School will be subject to appropriate checks.

- Exton & Greetham School only - CCTV is located around the School but is not installed in classrooms, changing rooms or toilet areas.

Parents must seek permission from the Headteacher if they wish to take photographs, digital images or videos, either on the School site or when pupils are involved in organized activities off-site. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult and report the matter to the DSL as soon as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

15. Other Relevant Policies

The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies listed below:

- Behaviour Management
- Staff code of conduct
- Racist Incidents
- Anti-bullying (including cyberbullying)
- Physical Interventions/Restraint (DfE Guidance "Use of Reasonable Force" and Screen, searching and confiscation")
- Special Education Needs and Disability
- Trips and Visits
- Work Experience
- First aid and administration of medicines, including toileting and intimate care
- Health and Safety
- Relationships and Sex Education
- Equal opportunities
- E-Safety
- Security and Access

16. Policy Review Process

The DSL will monitor the operation of this policy and its procedures.

Opportunities for staff to shape safeguarding arrangements and child protection policy will be given through informal feedback, and formally through the Information and Consultation Forum.

The Local Governing Body will undertake an annual review of the policy and ensure that any deficiencies or weaknesses in regard to child protection arrangements are rectified without delay.

APPENDIX 1

Understanding abuse and neglect

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are both forms of maltreatment. Abuse happens when someone inflicts harm on a child (e.g. hitting them); neglect occurs when someone fails to act to prevent harm (e.g. not seeking medical treatment for an injury). Children can be abused by people known to them or, more rarely, by strangers (e.g. via the Internet). They can be abused by adult(s) or by other children.

1. Types of Abuse and Neglect

[Keeping Children Safe in Education](#) describes four categories of abuse and neglect, and further specific safeguarding issues. Staff should be aware of all of them, and their warning signs. It is important to realise that safeguarding issues are not usually single events that fit neatly into one particular category. In many cases, you might see multiple issues overlapping.

Physical Abuse

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

Emotional Abuse

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.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 of 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.

Neglect

Defined as 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.

2. Signs Of Abuse Or Neglect

Note that, while these are signs that should cause staff to be concerned for a child, they are not necessarily evidence of abuse. In some cases, there may be other explanations. However, these signs must always be reported, so the underlying cause can be investigated properly.

- Changes in behaviour e.g. aggression, challenging, disruptive, withdrawn or clingy; difficulty sleeping or bed-wetting
- Aggressive or bullying behaviour
- A 'don't care' attitude
- Deterioration in work or attitude
- Socially isolation
- Ill-fitting and/ or dirty clothes
- Consistently poor personal hygiene
- Problems at school: e.g. sudden lack of concentration and learning, or appearing tired and hungry
- Drinking alcohol regularly
- Strong efforts to avoid specific family members or friends, without obvious reason
- Reluctant to go home at or fear of parents being contacted
- Concerned for younger siblings without explaining why
- Avoiding changing clothes in front of others, or avoiding participation in physical activities
- Shy away from being touched or flinch at sudden movements.
- Being left at home alone, with inappropriate carers or with strangers
- Regularly missing from education
- Poor school attendance and punctuality, or consistently late being picked up
- Talking about running away
- Parents dismissive and non-responsive to concerns
- Parents collect children from school when drunk, or under the influence of drugs
- Unexplained injuries;
- Fabricated or self-induced illness;
- Self-harm.
- Eating disorders, depression/ withdrawal, or low self-esteem
- Compulsive stealing

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement. If you are concerned, then further advice is available in the government document [What To Do If You're Worried A Child Is Being Abused](#) (March 2015).

APPENDIX 2

Specific Safeguarding Issues

Staff should be aware of potential safeguarding issues, all of which must be reported. Many of these are listed below, although the list is not exhaustive. Several organisations provide up-to-date guidance and practical support which may be useful. For example, the NSPCC offers information for schools at <http://www.nspcc.org.uk>. Further information can also be found in [*Keeping Children Safe in Education*](#) (2018).

Risky behaviours such as drug-taking, alcohol abuse, truanting and sexting put children at increased risk and should therefore always be reported as safeguarding concerns.

Child Missing Education

A child missing education is a potential indicator of abuse or neglect and therefore the school takes its responsibilities seriously in this matter. Staff should follow school procedures for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation. To help prevent the risk of a child going missing in the future, staff should look out for individual triggers which could lead to a child going missing from education. These could in turn raise other safeguarding concerns, such as travelling to conflict zones, FGM and forced marriage. The School has a duty to inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of ten school days or more.

Child Criminal Exploitation (County Lines)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of 'county lines' criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Child Sexual Exploitation

Involves exploitative situations, contexts and relationships in which children and young people (male and female, of a range of ethnic origins and ages, in some cases as young as ten) receive something in exchange for sexual activity. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying and grooming. 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. Perpetrators of child sexual exploitation are found in all parts of the country and are not restricted to particular ethnic groups.

Domestic Abuse

Refers to controlling, coercive, or threatening behaviour, violence and abuse between partners or family members. The abuse often may have psychological, physical, sexual, financial, or emotional aspects.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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 should be handled and escalated as such.

Two specific examples 'honour based' violence are FGM and forced marriage. These are described below.

Female Genital Mutilation (FGM)

Comprises partial or total removal of external female genitalia, or other injury to the genital organs. Victims are likely to come from a community that is known to practise FGM. Staff should be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Once an act of FGM is suspected, the member of staff must report the case to the DSL who will report it to the Local Safeguarding Children Board and police. Staff should note their *personal* responsibility for ensuring this is done, since they are legally required to do so under the Serious Crime Act (2015).

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The government's Forced Marriage Unit has published [multi-agency guidelines](#) and staff can contact them for advice or information. (See contact details at the start of this document.)

Teachers can be prohibited from teaching if they do not report sexual exploitation, forced marriage and FGM.

Radicalisation and Extremism

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is defined by HM Government as ‘vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of the armed forces whether in this country or overseas.’

There is no single way of identifying individuals who might be susceptible to extremist views. Specific background factors (e.g. emotional problems) may contribute to vulnerability, as may the influence of such as family, friends. The Internet and social media, in particular, have become major factors in the radicalisation of young people. The risk of radicalisation may vary according to wider social and political factors.

Although the School assesses the risk to be low at present, we will implement prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials; undertaking appropriate checks on visiting speakers; discussing the dangers with pupils in suitable forums; and undertaking Prevent awareness staff training to ensure that staff are able to identify pupils at risk and know how to intervene. In addition, the school’s curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others.

It is possible to intervene to prevent vulnerable people being radicalised. Protecting children in this way is part of the School’s wider duties to protect children from harm and abuse. All schools are subject to a duty under the Counter-Terrorism and Security Act (2015) to have ‘due regard to the need to prevent people from being drawn into terrorism’. This is commonly known as the Prevent duty. 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.

The normal safeguarding referral procedures set out in this policy apply where there are concerns about children who may have been drawn into terrorism. If a member of staff has serious concerns that a pupil is being radicalised and/or drawn into extremism they should immediately report their concerns to the DSL. They may also report their concerns directly to the police: see contact details at the front of the policy. Further ‘local’-based information on Prevent can be found at <http://www.leicesterprevent.co.uk>.

Sexual Violence and Sexual Harassment

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. The experience is likely to have an adverse effect on their educational attainment and overall wellbeing.

Sexual violence includes any sexual activity that takes place without full, informed consent, and includes rape and sexual assaults. *Sexual harassment* includes behaviour which violates a child’s dignity; makes them feel intimidated or humiliated; or creates a hostile, offensive or sexualised environment. It may include behaviour such as making sexual comments, unwanted touching, or non-consensual sharing of sexual images online. Sexual violence and sexual harassment exist on a

continuum and may overlap. They can occur online and offline (both physical and verbal). It is more likely that girls will be the victims and boys the perpetrators, although this is not always the case.

Young people who exhibit harmful sexual behaviours may themselves have experienced trauma or abuse. Addressing their inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexting

Sexting among young people can be a common occurrence. It is even seen by some as a 'normal' part of a relationship. National Police Chiefs Council (NPCC) guidance recommends reports of children being involved in sexting should be dealt with in a proportionate way and that it might not be appropriate to carry out a full criminal investigation.

However, it remains a criminal offence to possess, distribute, show or make indecent images of children, and young people risk images they have shared being distributed beyond their control. All instances of sexting that are discovered must be reported as a safeguarding concern.

Instances of sexting may be viewed as particularly serious if:

- There is a significant age difference between the sender and receiver
- There is any coercion involved or encouragement beyond the sender/ receiver.
- If you the child is more vulnerable than usual.
- If the image is of a severe or extreme nature.
- If the situation is not isolated and the image has been more widely distributed.
- If this is not the first time children have been involved in a sexting act
- If other knowledge of either the sender or recipient may add cause for concern..

Other Safeguarding issues include:

- Bullying – including cyberbullying
- Children missing from home or care
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence/ violence against women and girls
- Hate
- Mental health
- Missing children and adults
- Private fostering
- Relationship abuse
- Trafficking

APPENDIX 3

Staff Code of Conduct with Pupils

All staff have a duty to ensure that they are familiar with and follow the policies and practices outlined in the Code of Conduct and their respective staff handbook. These documents cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff and all of our dealings with pupils must be guided by sound professional judgement and common sense.

Failure to comply with this Code of Conduct may lead to disciplinary action being taken under the School's disciplinary procedure up to and including dismissal. More serious breaches may also lead to criminal prosecution.

Staff should:

- Lead by example, conducting themselves in a professional manner towards colleagues, visitors, pupils and parents at all times and providing a good role model for emerging adults.
- Present a positive image of the School to the wider community and be a good ambassador at all times.
- Wear clothing that promotes a positive and professional image and is not likely to be viewed as scruffy, offensive, revealing or sexually provocative.
- Never use abusive or bad language to, about, or in the presence of, a pupil.
- Exercise their duty of care towards pupils and take all reasonable steps to ensure the safety of pupils and other staff by following the Health and Safety policy and guidelines.
- Ensure intimate care and first aid are only administered according to relevant procedures.
- Not misuse their power and influence over children.
- Never conduct any form of sexual or inappropriate personal relationship with a pupil; or have sexually suggestive or provocative communications with a pupil; or make sexual remarks to or about a pupil; or discuss their own sexual relationships in the presence of pupils.
- Never conduct any form of sexual or intimate relationship with a recent former pupil that had its grounding in a staff-pupil connection.
- Generally, avoid physical contact with a pupil that is not job-specific. When physical contact is made, for example with a very distressed pupil, this should be in response to their pastoral needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Physical contact should never be inappropriately used and must be able to be justified.
- Not engage in Skyping, messaging or chat rooms etc. with pupils.
- Not befriend or accept as a friend a pupil on Facebook or other social networking sites.
- Not take unauthorised photos of pupils. Photos should be the property of the School and not retained on personal equipment.
- Be aware that it is not uncommon for a pupil to develop an infatuation with a member of staff and if this seems to be happening, take steps to discuss it at the earliest opportunity with a senior colleague.

- Be mindful of situations where a pupil (or parent) comes to depend on them for support outside their role and discuss this promptly with a senior member of staff.
- Respect confidentiality regarding information about pupils and their families. In such cases where abuse is alleged or suspected, however, individuals have a duty to pass on information without delay to those with designated safeguarding responsibilities e.g. the Designated Senior Lead (Child Protection Officer).
- Not condone any illegal drinking, drug-taking, smoking or other breaches of School rules by pupils.
- Report to the Headteacher any concerns about the behaviour of staff that may be in breach of this Code of Conduct.
- Report to an appropriate Senior Manager any concerns about relationships or incidents occurring between any staff member or themselves and a pupil, which go beyond the acceptable professional boundaries of the staff-pupil relationship.

APPENDIX 4

Role and Responsibilities of the DSL

In accordance [KCSIE \(2018\)](#), the main responsibilities of the Designated Safeguarding Lead are to:

Manage referrals

- Refer cases of suspected abuse to Social Services
- Support staff who make referrals to Social Services
- Attend and/ or contribute to child protection conferences, strategy meetings etc.
- Refer cases to the Channel programme where there is a radicalisation concern
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child to the Disclosure and Barring Service.
- Refer cases where a crime may have been committed to the police.

Work with others

- Liaise with the Headteacher in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the School
- Liaise with the LADO in all cases which concern a staff member
- 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.

Raise awareness

- Ensure this Policy and all safeguarding procedures is known, understood and used appropriately.
- Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, in collaboration with the LGB.
- Ensure this Policy is available publicly.
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to Social Services, and the School's role in this.
- Maintain links with the Rutland Local Authority and other lead agencies for safeguarding, to ensure staff are aware of training opportunities, local policies and issues.

Child protection file

- Ensure that, where children leave the School, their child protection file is transferred to the new school as soon as possible, separately from the main student file and in a secure manner, obtaining confirmation of receipt.

Prevent

In accordance with the [Revised Prevent Duty Guidance for England and Wales](#) and [Channel Duty Guidance \(2015\)](#) the Designated Safeguarding Lead additionally has the following responsibilities:

- Acting as the first point of contact for parents, students, staff and external agencies in all matters relating to the Prevent duty
- Coordinate Prevent duty procedures in the School
- Liaise with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/ or the police where indicated

- Maintain ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training
- Monitor the keeping, confidentiality and storage of records in relation to the Prevent duty.
- Understand the unique risks associated with online safety and be confident they can keep children safe whilst online at school.

Training

The DSL and Deputy DSLs undertake training to ensure they have the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, 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 are able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals
- Understand and support the school with regard 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
- 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.

APPENDIX 5

Related Documentation/links

This list covers some of the key documents on which the school's safeguarding is based, but is not exhaustive.

1. Legislation and External Guidance

- Children Act (1989)
- Children Act (2004)
- Education Act 2002 (Section 175/157)
- [Keeping Children Safe in Education](#) (DfE, September 2019)
- [Working Together to Safeguard Children](#) (2018)
- [Children Missing Education](#) (DfE, September 2016)
- [Guidance For Safer Working Practice For Those Who Work With Children In Education Settings](#) (Safer Recruitment Consortium, 2015)
- Education (Pupil Information) (England) Regulations (2005)
- [Preventing and Tackling Bullying](#) (DfE, July 2017).
- [Sexting in schools and colleges: responding to incidents and safeguarding young people](#) (UKCCIS, 2016)
- [Sexual Offences Act](#) (2003)
- [Sexual violence and sexual harassment between children in schools and colleges](#) (DfE, May 2018)
- Counter Terrorism and Security Act (Section 26, 2015)
- Female Genital Mutilation Act (2003) (Section 74, Serious Crime Act, 2015)

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance

	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
"Honour Based Violence" (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
	Forced marriage: information and practice guidelines	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities	DfE - statutory guidance

Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy

2. School Policies and Guidelines

- Staff Handbook
- Anti-Bullying Policy
- Conducting a Search Policy
- Cyberbullying Policy
- Drugs and Harmful Substances Policy
- E-Safety Policy
- Educational Visits Policy
- Health & Safety Policy
- Intimate Care Policy
- Attendance Policy
- Policy For Dealing With Allegations of Abuse Against Teachers and Other Staff
- British Values Policy
- Recruitment, Selection And Disclosure Policy And Procedure
- Safer Recruitment Guidance For Using Coaches, Sports Referees And Volunteers
- Staff Code of Conduct with Pupils

APPENDIX 6

Cause for concern form



Name of child:

Name of staff member:

Date of disclosure/incident/observation/concern:

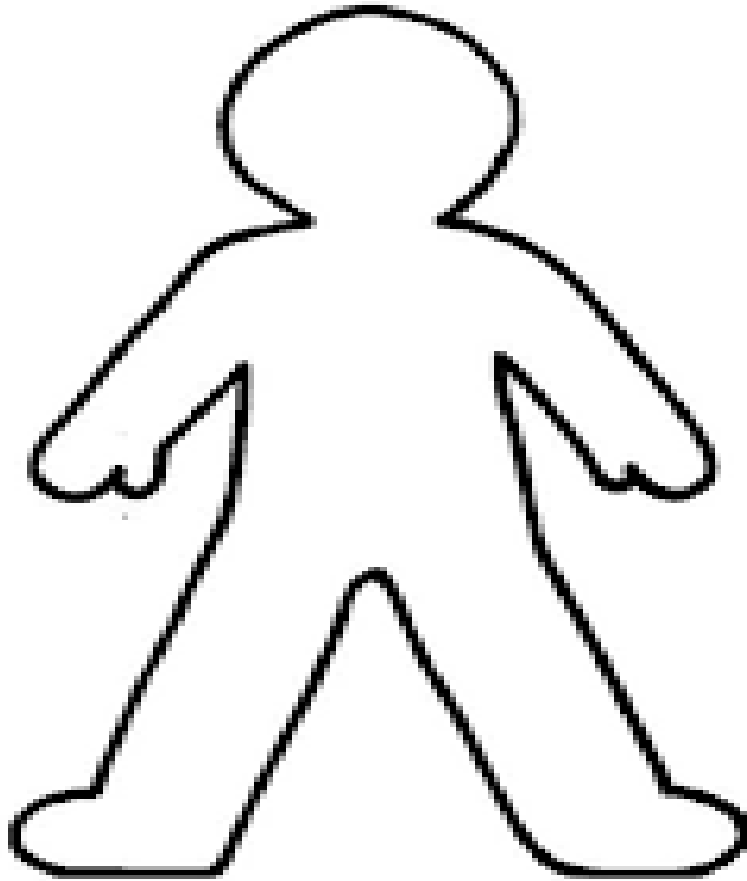
Place or context of incident/disclosure/observation/concern:

Cause for concern:

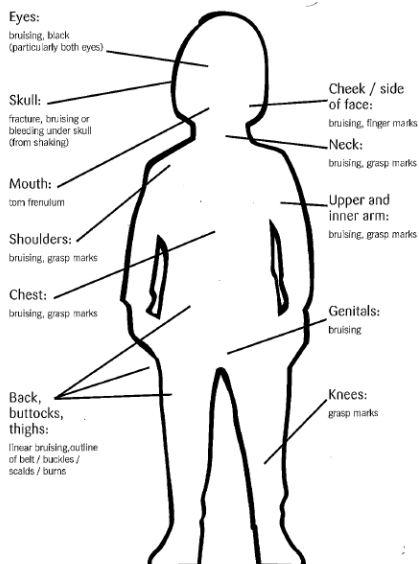
Signed:

Date:

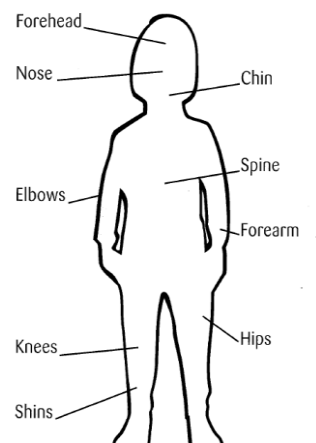
COPY for staff file and designated officer



Common sites for non-accidental injury



Common sites for accidental injury



Section 128

You need to carry out a 'section 128' check to see whether a person is banned from being involved in the management and governance of schools.

If someone has been issued with a 'section 128 direction', they can't serve on your board, and in academies, be on the senior management team.

Who needs to do them?

Academies

You **must** carry out section 128 checks on:

- Academy trust members and trustees
- Governors who sit on committees or local governing bodies with delegated responsibilities
- Academy staff engaged in management positions (see below)

The following are 'management positions':

- Headteacher
- Teaching positions on the senior leadership team

This is set out in paragraphs 124 to 125 of [Keeping Children Safe in Education \(KCSIE\)](#).

When is a section 128 direction issued?

A section 128 direction can be issued on specific grounds where the type of conviction, caution, or conduct suggests that the person is unsuitable for the management of a school.

These grounds include:

- Conviction of an offence under military disciplinary proceedings
- Being found not guilty of an offence by reason of insanity
- Conduct found to be in breach of professional standards by a professional body

Section 128 directions may also be issued if a person has engaged in conduct that is aimed at undermining:

- British values
- Rule of law
- Individual liberty
- Mutual respect and tolerance of those with different faiths and beliefs

This (and the full list of grounds) is set out in [regulation 2](#) of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014.

What does it stop someone doing?

A section 128 check identifies people who are subject to a section 128 direction. People with a section 128 direction can't:

- Hold a management position in an academy, free school or independent school (as an employee)
- Be an academy or free school trustee or member
- Be a governor on any academy or free school board that has delegated responsibilities
- Be a governor or member of the proprietor body of an independent school
- Sit on the governing board of a maintained school

This is set out in paragraphs 124 and 126 of KCSIE.

Why are these checks important?

Section 128 checks complement DBS checks by also looking at the parts of someone's history that may not necessarily be criminal, but would still be worrying.

For example:

- Someone who undermines mutual respect for those of different faiths may not be charged with a hate crime, but you still wouldn't want them associated with your school
- An accountant who has breached the code of ethics set out by their professional body by using confidential client information for personal gain hasn't necessarily committed a crime, but you probably wouldn't want them overseeing your school's accounts

How to conduct a check

For new appointments

If the person requires a DBS check **with** barred list, make sure you specify '*children's workforce independent schools*' in the parameters when you apply for the enhanced DBS check.

If the person **doesn't** need a barred list check, you'll have to use the Department for Education's (DfE) secure access portal to conduct the section 128 check, see instructions below.

For existing staff, governors, trustees and members

Log on to the [DfE's secure access portal](#) and carry out the check through the 'Teacher Regulation Agency' (even for governors).

If they don't have a teacher reference number

Most governors won't have a teacher reference number. But you can download a list of all of the people with a section 128 direction against them and search that list. [GOV.UK](#) has more information about how to access these lists.

DBS update service

You can also use the [DBS update service](#) to conduct the check if:

- The person is subscribed to the service
- They have already had a DBS with a barred list