



PensMeadowSchool

Living, Growing, Learning

Safeguarding and Child Protection Policy

SEPTEMBER 2023

NEXT REVIEW DATE: SEPTEMBER 2024

Staff Responsible: Mr M. Pawlowicz – Deputy Headteacher, DSL

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PENS MEADOW SCHOOL SAFEGUARDING POLICY (Including Child Protection)

Date of Policy: September 2023

Next review date: September 2024 (or in line with updated guidance)

Member of staff responsible: Designated Safeguarding Lead – Mr Michal Pawlowicz

This safeguarding policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school and should be read in conjunction with the Behaviour Policy and:

- Anti-Bullying Policy
- Online Safety Policy including Mobile Phone Usage
- Whistleblowing Policy
- Intimate Care Policy
- Staff Disciplinary Policy
- Extremism and Radicalisation policy and risk assessment

Key contacts:

Safeguarding Lead DSL, Deputy Head Teacher
Head teacher, DSL
Business Manager, Designated Person for Whistleblowing, DSL
Chair of Governors

Mr Michal Pawlowicz
Mrs Marie Hunter
Mrs Alison Austin
Mr Paul Leyshon

Local Authority Designated Officer

Mrs Yvonne Nelson-Brown,

Virtual School Head

Mr Andrew Wright

Named Child Looked After Lead, Online Safety Lead,
Online Safety

Mr Michal Pawlowicz

1. Aims

Pens Meadow School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL is Michal Pawlowicz. In the absence of the DSL, child protection matters will be dealt with by the deputy DSL, Marie Hunter and Alison Austin.

2. School Context

Pens Meadow School is committed to safeguarding and promoting the welfare of all children and young people, including their mental health, both within the school environment and outside. We recognise our responsibility to provide a safe environment in which children can learn. This includes the online environment.

Pens Meadow School is committed to ensuring that all staff who meet children and their families and carers have a role to play in safeguarding children. To fulfil the responsibility effectively, the school will ensure their approach is child centred. This means that they will consider, always, what is in the best interest of the child.

Because of our day-to-day contact with children and young people, education staff are particularly well placed to observe outward signs of abuse, changes in children's behaviour or their failure to develop. We need, therefore to be alert to the possibility of abuse occurring, aware of the procedures to be followed if the school have suspicions and have the confidence to follow those procedures. This policy applies to all staff, governors and volunteers working in the school.

Child Protection and wider child safety issues will be addressed as part of a broad and balanced curriculum as appropriate, especially in Personal, Social and Health Education (PSHE), Information and Communication Technology (ICT), Citizenship and Relationships and Relationships and Sex Education and Online Safety, so as to teach pupils how to recognise when they are at risk and how to get help when they need it.

Working Together to Safeguard Children (2018, updated 2020) requires all schools to follow the procedures for protecting children from abuse which are established by their local safeguarding

partners. At Pens Meadow this is the Dudley Safeguarding People Partnership Board (DSPPB). (www.dudleysafeguarding.org.uk/).

Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse including online and sexual exploitation. These procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating and impacting on their mental health. Research and Child Safeguarding Practice Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; and a lack of challenge to those who appear not to be acting.

3. Legislation and statutory guidance

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2023) 'Keeping children safe in education 2023'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'

- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

1. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

- Protecting pupils from maltreatment.
- Preventing the impairment of pupils’ mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.

- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

For the purposes of this policy, **“abuse”** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **“physical abuse”** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **“emotional abuse”** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and

limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **“neglect”** is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

2. Equality statement

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

We give special consideration to children who:

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

3. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Dudley Safeguarding People Partnership Board (DSPPB) (<http://dudleysafeguarding.org.uk>). Our policy and procedures also apply to extended school and off-site activities.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) **sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse)**, criminal exploitation, online abuse, serious youth violence, county lines, and radicalisation.

6.1 All staff

All staff will read understand and sign that they will abide by part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (2022), and review this guidance at least annually.

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.

- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

6.2 Teachers

Teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

6.3 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is a senior member of staff from the leadership team and has responsibility, management oversight and accountability for child protection, along with the Head Teacher. Deputy DSLs are trained to the same standards as the DSL and the role is explicit within their job description. DSL training is undertaken every 2 years and has been updated to allow the DSL to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident that they have the capability to support SEND pupils to stay safe online.

Our DSL is Mr Michal Pawlowicz, Deputy Head Teacher. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Mr Pawlowicz can be contacted out of school hours through an email: safeguarding@pens-meadow.dudley.sch.uk. This will send a notification directly to him.

When the DSL is absent, the Head Teacher – Mrs Marie Hunter and Business Manager – Mrs Alison Austin will act as cover.

The DSL will be given the time, funding, training, resources and support to fulfil his responsibilities to safeguard children. The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
 - Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
 - Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
 - Contribute to the assessment of children, and/or support other staff to do so.
 - During term time, be available during school hours for staff to discuss any safeguarding concerns.
- NB:** Individual schools, working with the DSL, define what "available" means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.

- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
 - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.

- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- 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; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Please refer to Keeping Children Safe in Education 2022, Annexe B in regards to specific responsibilities.

6.4 The Governing Body

The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance ['Working Together to Safeguard Children'](#).
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE.
NB: Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.

- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

6.5 The Head Teacher

The Head Teacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parent/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required
- Complete appropriate safeguarding and child protection (including online) training
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

4. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with DSPPB, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

5. Communication with Parents/Carers

At Pens Meadow School all staff work as key workers for individual children. They develop positive working relationships with parent/carers through frequent communication. This is implemented by:

- communication in person at the beginning and the end of the day
- sending messages in home-school diaries
- using email system
- telephone conversations
- inviting them to MDT meetings
- EHCPs reviews

Pens Meadow recognises that it is everybody's responsibility to assess the needs of the children and young people they meet and to safeguard them effectively, by assessing and managing risk alongside other agencies.

At Pens Meadow we operate a keyworker approach across the school. This enables parents/carers to build a positive relationship with a key member of staff with whom they can discuss any issues. This alongside our weekly Team around the Child (TAC) meetings, allow the school to identify pupils/families who may require additional support.

In addition, we recognise that being a parent/carer of a disabled child presents its own challenges and that these challenges can impact on the whole family. When families are well supported and equipped to overcome these challenges, we know that this can only have a positive impact on our parent/carers, their children and their engagement in school.

In recognition of this Pens Meadow School has recruited their own Family Outreach Team. The Family Outreach Team consists of a Family Outreach Coordinator and a Family Support Worker. The team work closely with our families to provide support, sign posting and engagement opportunities. Our service is unique to Pens Meadow School. The team work closely with services across the borough and aims to be a contact point for information sharing as well as providing direct support to our families.

The Family Outreach Team work with families in school or through home visits to support with advocacy, benefit forms, coordination of services, referrals for support, transition support, access to funding.

6. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.

- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff, Family Outreach Team in particular, may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Children Disability Team for assessment for statutory services if the pupil's situation is not improving or is worsening.

7. Abuse and Neglect

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

8. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

11.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

Dudley **Report it** page: <https://safeguarding.dudley.gov.uk/tell-us/>

The guidance below should be followed in conjunction with the government document – '[What do you do if you are worried a child is being abused March 2015](#)'

If any member of staff is concerned about a child, they must inform the Designated Safeguarding Lead (or Deputy DSL) in person or by telephone immediately. Information should not be left in pigeon holes. The member of staff must record information regarding the concerns.

At Pens Meadow ALL concerns regarding a child including those around online safety must be recorded on CPOMS. In case there is no online access any person concerned about the child should fill in the Cause for Concern pro-forma shown in Appendix 7, available on the safeguarding noticeboard in the staff room, from the office or copies can be found in each class and hand it directly to the DSL. Do not leave it in their pigeon hole or on their desk for them to 'find'. It may be urgent and require an immediate response. This is printed onto pink paper to make it visible for all. The recording must be a clear, precise, factual account of the observations.

The Designated Safeguarding Lead will decide whether the concern should be referred to the Social Care Team through the Dudley Front Door. If it is decided to make a referral, this will be discussed with the parent/carers, unless to do so would place the child at further risk of harm. A Request for Help and Support will also be completed. See 'The Referrals Process' Appendix 6.

Attention will be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a child protection plan and a written record will be kept.

11.2 If a child makes a disclosure to you

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
 - Do not communicate shock, anger or embarrassment.
 - Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
 - Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you must tell other people in order to do this. State who this will be and why.
 - Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
 - Tell the child that it is not her/his fault.
 - Encourage the child to talk but do not ask "leading questions" or press for information.
 - Listen and remember.
 - Check that you have understood correctly what the child is trying to tell you.
 - Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
 - Do not tell the child that what s/he experienced is dirty, naughty or bad.
 - It is inappropriate to make any comments about the alleged offender.
 - Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
 - At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
 - As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- (All staff must record their concerns in CPOMS. In case there is no online access any person concerned about the child should fill in Cause for concern reporting form (See Appendix 7) – This is printed onto pink paper to make it visible for all)

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

11.3 Concerns outside the immediate environment (e.g. a parent or carer)

- Report your concerns to the, Designated Safeguarding Lead who should contact Social Care Team or the Police as soon as possible.
- If the Designated Safeguarding Lead is not available, then speak to the deputy DLS or the person currently responsible for the school should be informed. (This is to ensure there is no delay in seeking advice or making a referral).
- Social Care Team and the Designated Safeguarding Lead will decide how to involve the parents/carers. Parent/carers should not be informed if to do so would increase risk to the child.
- Maintain confidentiality on a need to know basis only.

11.4 Information for social care or the police about suspected abuse

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The reasons for your concern
- Full name and date of birth of the child
- Names and dates of birth of the child's family/household members
- Other agencies/professionals involved with the family
- The child's first language and any special needs
- The child's developmental needs, family and environmental factors and parenting capacity
- Any work you may have already undertaken with the child and family

All incidents will be reported through Dudley Portal by submitting Request for Help and Support form online.

11.5 Child's Wishes

Where there is a safeguarding concern governing body and school leaders ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Children have frequent opportunities to express their views and give feedback. Where the child is not able to express themselves the school's systems and processes will act in the best interest of that child.

Should any member of staff disagree with the actions taken following the referral they should refer to Dudley Professional Challenge and Resolution Protocol and follow the process.

11.6 Mental Health

Positive mental health is the concern of the whole community and we recognise that schools play a key part in this. Our school wants to develop the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs.

We understand that there are risk factors, which increase someone's vulnerability, and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter balance and promote further growth of resilience.

It is vital that we work in partnership with parent/carers to support the well-being of our pupils. Parent/carers should share any concerns about the well-being of their child with school, so appropriate support and intervention is identified and implemented.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following our Safeguarding Policy, and speaking to the designated safeguarding lead or a deputy.

Mental Health & Behaviours in School

11.7 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education 2023 explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2.

Any teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

Any member of staff who suspects a pupil is *at risk* of FGM or discovers that a **pupil age 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

Local guidance regarding FGM can be found on [Dudley Safeguarding People Partnership Board](#) website.

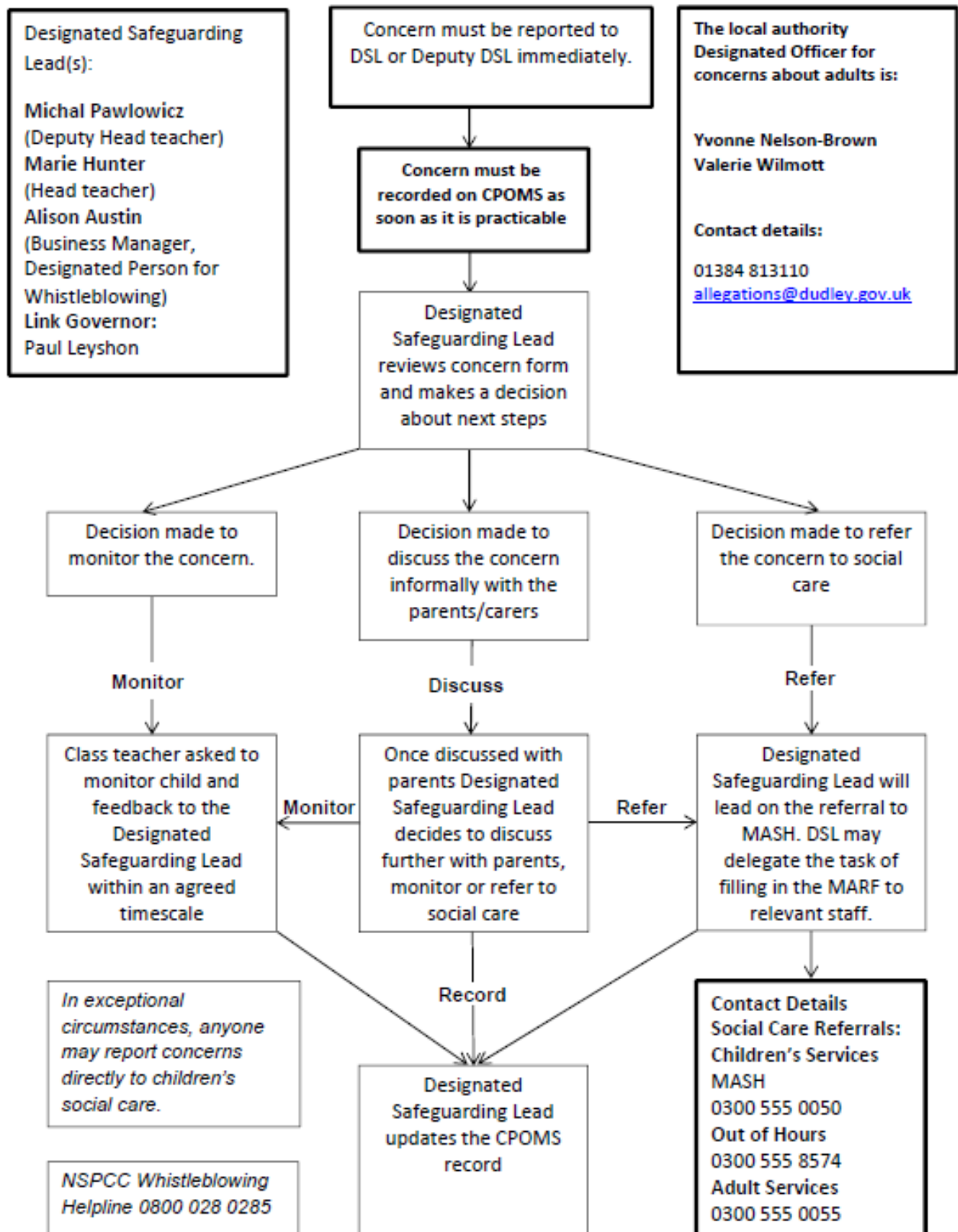
11.8 If you have concerns about a child (as opposed to a child being in immediate danger)

Flowchart 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Flowchart 1: procedure if you have concerns about a child's welfare (no immediate danger) –
TO BE UPDATED



11.9 Referral

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

If you make a referral directly (see section 11.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or a person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or a person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

Should anyone have a concern about any form of exploitation they should discuss it with DSL. DSL then will use Contextual Safeguarding Screening Tool and make a referral into Exploitation Hub by email: CS.Hub@dudley.gov.uk.

For Prevent referrals we will liaise with safe & sound (Dudley's Community Safety Partnership) website - <https://www.dudleysafeandsound.org/prevent>.

11.10 If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

11.11 Concerns about a staff member or volunteer

An appropriate action should be taken should it be alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers and volunteers 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 or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If you have concerns about a member of staff or volunteer, that may indicate that the harm threshold has been met, speak **only** to the **Headteacher**. If you have concerns about the Headteacher, speak to the **Chair of Governors**.

You can discuss any low-level concerns about any staff member or volunteer with the DSL.

The Head Teacher/chair of governors/DSL will then follow the procedures set out in appendix 4, if appropriate.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 4 for more detail).

11.12 Allegations of abuse made against other pupils

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s [statement of intent](#).

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

9. Children Looked After

The Designated Teacher for Looked After Children at Pens Meadow School is Mr M. Pawlowicz. He is responsible for promoting the educational achievement of children who are looked after and/or who have left care through adoption, special guardianship, child arrangement orders or who were adopted from state care outside England and Wales. The Designated Teacher has the skills, knowledge and understanding to keep previously looked after children safe. The Designated Teacher will work closely with the Virtual School Head and all other agencies, to ensure that prompt action is taken in respect of any concerns and that Pupil Premium funding is best used to support the progress of the child looked after. In the case of care leavers, the LA retains an ongoing responsibility which includes keeping in touch with them, preparing assessments of their needs and appointing a personal advisor to develop a pathway plan. Where applicable, the DSL will liaise with their LA personal advisor as necessary.

10. Online safety and personal electronic devices

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

13.1 Involving parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

13.2 Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

13.3 Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Use of Mobile Technology Policy.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photographs Consents. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

13.4 Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

13.5 Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as "sexting" or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

Due to the nature of our school population, the school's full response to incidents of consensual and non-consensual sharing of indecent images and videos will be in line with general safeguarding procedure.

11. Pupils potentially at greater risk of harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

12. Use of the school premises for non-school activities

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

13. Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

14. Complaints and concerns about school safeguarding practices

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

17.2 Other Complaints and Whistleblowing

This section should be read in conjunction with Confidential Reporting Policy.

17.3 Professional Challenge and Resolution Protocol

Should any of the staff disagree with the professionals' decisions regarding safeguarding matters and they wish to challenge they should use Dudley's Professional Challenge and Resolution Protocol available on request from the DSL.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on CPOMS or on pink Cause for Concern forms if CPOMS is not available. This must be completed without delay. If you are in any doubt about whether to record something, discuss it with the DSL.

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

At Pens Meadow School we have a robust reporting and recording system.

- all staff use CPOMS as a recording system, however paper versions of concern forms are still available.
- Outcomes of all concerns are recorded and stored appropriately:
 - in student's file, or

- Safeguarding file if necessary
- CPOMS database
- Safeguarding files are kept in a locked cabinet in SLT office at Ridge Hill site. There are 2 keys that can open this cabinet. Safeguarding Lead has one and one is in a locked key cabinet in the main office.
- Only DSLs have access to CPOMS records of safeguarding concerns. Other staff members may record and view their individual concerns but won't be able to view the outcomes or other concerns.
- Family Outreach workers have extended access to CPOMS but they are only able to view and create reports for non-safeguarding items.
- If a pupil moves from our school, the DSL will consider whether it is appropriate to share any information with the new school in advance of the pupil leaving. Child protection records may be forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools or in instances where advance information would allow the new school to continue supporting the victim of abuse and have the appropriate support in place for the pupil's arrival. We will record where and to whom the records have been passed and the date.
- If sending by post pupil records will be sent by "Special/Recorded Delivery". The notes are kept in a safeguarding folder in the office at Ridge Hill Site.
- If a pupil is permanently excluded or moves to a Pupil Referral Unit, child protection records will be forwarded on to the relevant organisation.
- When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder.
- Files of children that do not transfer to another educational establishment are archived and stored securely until individuals are 25 years old at the very least.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

In addition:

- Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

a. All staff

All staff members undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training is regularly updated and will be in line with advice from our Dudley Safeguarding People Partnership Board (DSPPB).

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a termly basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Children Absent from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

b. The DSL and deputies

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

c. **Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

d. **Recruitment – interview/appointment panels**

At least one person on any interview/appointment panel for a post at the school will have undertaken Safer Recruitment in Education Training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2022, and be in line with local safeguarding procedures. Further explanation can be found in Appendix 3.

14.5 Staff who have contact with pupils and families

All staff who have contact with children and families have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

15. Monitoring arrangements

This policy will be reviewed **annually and as required** by Mr Michal Pawlowicz, Deputy Head Teacher and Designated Safeguarding Lead. At every review, it will be approved by the full governing board and shared with all staff.

Appendix 1: specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **“domestic abuse”** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. **“Abusive behaviour”** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **“Personally connected”** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.

- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school’s permission for a continuous period of 10 school days or more.

The school will follow the DfE’s [guidance](#) on improving attendance where there is a need to work with children’s services due to school absences indicating safeguarding concerns.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil’s name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils’ data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.

- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **“cyber-crime”** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, **“child sexual exploitation”** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil’s immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.

- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called **“honour-based’ abuse (HBA)”**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, ‘2-finger’ or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands’ family to fulfil the requirement that a woman remains ‘pure’ before marriage. Those who ‘fail’ to meet this

requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "**extremism**" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "**terrorism**" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "**the Prevent duty**". The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be supported through being provided with the adapted booklet '[Going to Court](#)', when necessary, from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils will be provided with the booklet '[Going to Court and being a witness](#)' if required from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils

whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will be aware that the Police, Crime, Sentencing and Courts Act will introduce a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

Appendix 2: safer recruitment and DBS checks

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

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, including online social media, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

Disqualification under the Childcare Act 2006

Changes to Disqualification under the Childcare Act 2006, as amended by the Childcare (Early Years Provision Free of Charge) (Extended Entitlement)(Amendment) Regulation 2018 have been made, following a consultation into Disqualification under the Childcare Act 2006. The new legislation came into force on 31st of August 2018.

In the recent past, staff providing child care could, in certain circumstances, be prohibited from working with children because of the convictions made by someone who lives in their household. This is no longer the case.

Disqualification by Association now only applies in domestic premises, not to schools. However, staff working in child care may still be disqualified because of offences committed by themselves. Relevant people include anyone working with children of reception age or younger and children between five and eight years old in and out of the school setting (like breakfast clubs or afterschool care).

All staff at Pens Meadow School are made aware that their 'relationships and associations' (including online) may have a safeguarding implication.

Regulated activity means a person who will be:

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

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

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

Agency and third-party staff

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

Contractors

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

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

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

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

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

- All governors will have an enhanced DBS check without barred list information and section 128 check
- They will have an enhanced DBS check with barred list information if working in regulated activity.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

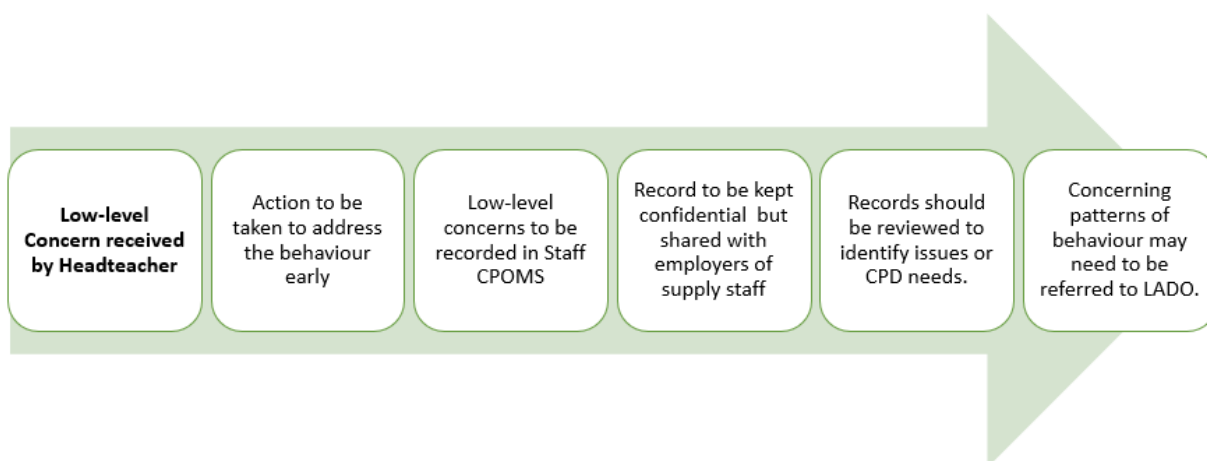
Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit .

Appendix 3: concerns/allegations made against staff

Allegation/concerns that do not meet the harms threshold ('low-level' concerns)

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.



Allegations that may meet the harms threshold

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

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

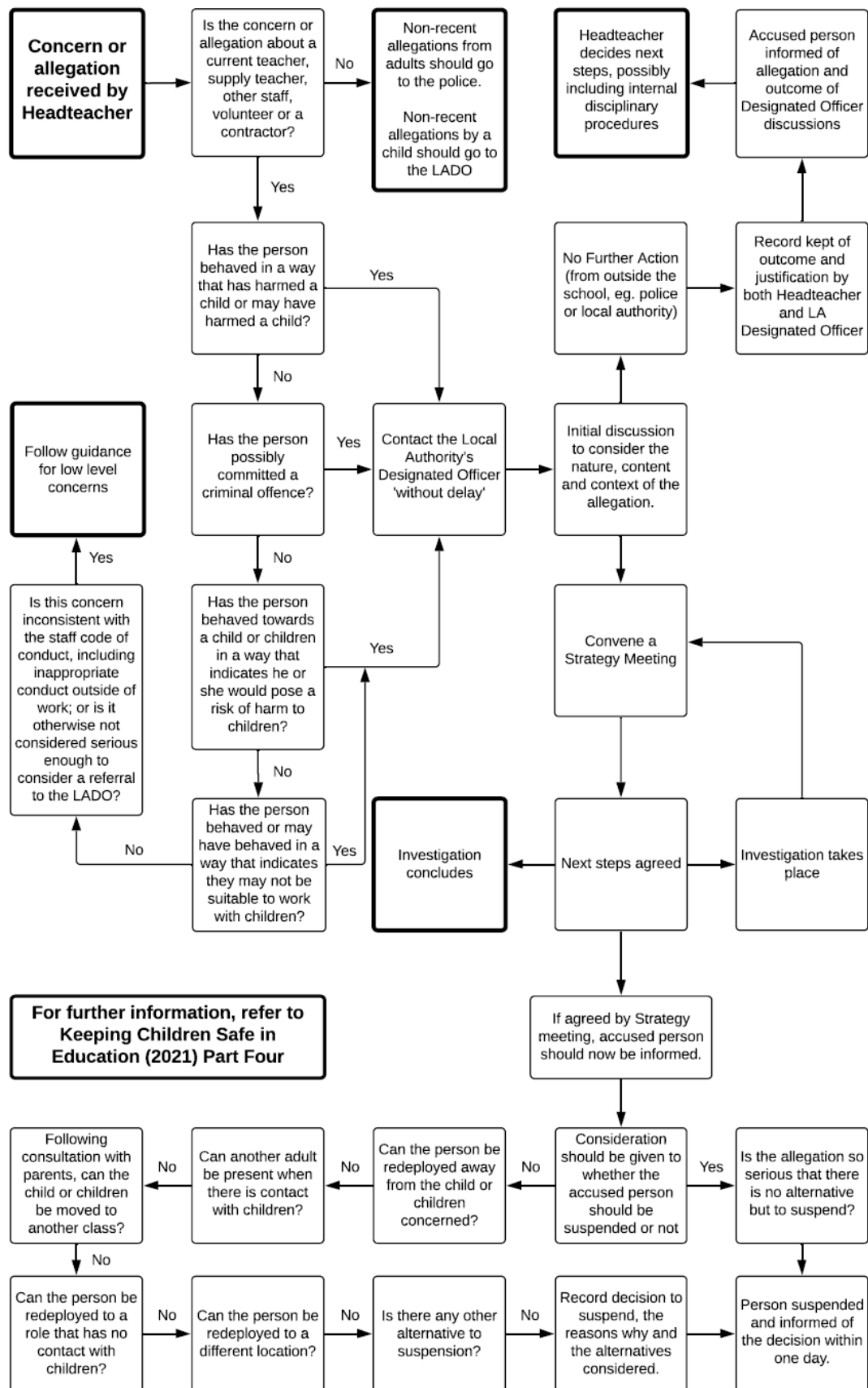
It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Flowchart below illustrates the decision making process and actions taken when allegations made may meet the threshold stated above.

Flowchart 2 – allegations that may meet the threshold



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Suspension

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether

alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

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

References

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

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

Appendix 4: Family Centre Cluster Working – Dudley Early Help Offer

Background

In 2018, Dudley Children and Young People's Alliance Board endorsed Dudley's Early Help Strategy. This has been reviewed March 2021 and resulted in development of **Children, Young People and Families Threshold Guidance and Framework for Support** document.

This document served to provide the overarching aim of Dudley's threshold guidance enabling effective, well co-ordinated early help for those who need it and a seamless journey of support for children, young people and their families across all levels of need.

A key part of the Early Help operating model highlights cluster based working as the preferred model of delivery for Early Help Services across the Borough. Five clusters operate from 0-19 years (up to 24 years if the young person has a learning difficulty or disability) Family Centre in each of the Cluster areas..

What do we mean by cluster working?

Each Cluster is organised around universal services including schools, with a Family Centre at its heart. Cluster working arrangements are designed to ensure that families are offered the right intervention at the right time, and as early as possible to prevent issues escalating which may result in poor outcomes for the family.

Clusters bring together a range of universal and targeted early help services in each local area, including schools and services provided by the voluntary and community sector. Through clusters, children's services and key partners aim to provide a local model of support for children and families. They link schools and early years provision with targeted early help support for children and their families, to improve outcomes wherever they live in the borough.

Clusters have a range of co-ordinated community services to meet different levels of need, delivered by providers from across the public, voluntary and private sectors to support families and communities in each local area. There are five Clusters across the borough, each with a Family Centre that is easily accessible by the public. Professionals from a range of agencies are co-located, working closely together around a child's or family's needs. This offers the opportunity to consider fuller integration into multi-agency teams at a later stage. Each Cluster works closely with its Early Years, Primary and Secondary Schools.

Cluster working enables local practitioners to build good working relationships in order to provide effective services for the families in their area. This ensures that families receive the right support at the right time at the earliest opportunity. Building effective working relationships helps to facilitate information sharing where appropriate - a key aspect of safeguarding.

Early Help and Universal Services Delivered from the Clusters

Targeted Early Help services are available for children and young people aged 0-19 (24 where the young person has a disability) and their families. Early help is also delivered by universal services, particularly schools, and Clusters ensure close relationships with all universal services. Services include*:

- Local Authority Family Solutions Early Help services

- Childcare
- All education establishments including Early Years, primary, secondary & post 16
- Police
- Volunteer delivered services by (e.g. Breastfeeding Buddies and Helpline)
- Health Visiting Service
- Midwifery Service
- Housing
- Primary Emotional Health & Wellbeing Service (includes School Health Advisor Service)
- Birth Registration Service
- Open access community services delivered by voluntary organisations

*This is not an exhaustive list

The exact composition will vary across the five Clusters, in line with its needs analysis to ensure resources and services are based on an individual profile of local need.

Early Help Assessments

An Early Help Assessment is recommended when single universal services identify that a child has some additional needs. It becomes a requirement when Universal Plus services are no longer meeting needs and a co-ordinated response from more than one agency is required. This is at the threshold between Level 2 and Level 3 (See below)

Early Help Assessments include the whole family and result in outcome-focused plans. It is essential that parental consent to share information is obtained (where age of child requires this), and this will normally be the responsibility of the referring agency to obtain.

Consent and Information Sharing

The Early Help Assessment is centred on professionals seeking consent to share information with partner agencies.

The Early Help Assessment consent should be signed by all household members who are aged 16 and over. Practitioners should encourage the parent/carer to inform younger children in the household of the family's involvement in the Early Help programme and that data is being shared with other agencies.

Stage 1 – Assessments/Early Help Assessments

Early Help - Where Dudley's Threshold Framework indicates that children's needs are Level 2 or 3 (see below) an Early Help Assessment will be completed by a Lead Professional.

Every completed Early Help Assessment will be sent to the appropriate monitored cluster inbox linked to the child's home address:

MASH - Where there are child and family needs identified through contact via the MASH through organisations who are not ordinarily in a position to undertake an Early Help Assessment (Paramedics, GP, Police, Fire Service etc.) the Early Help Desk will complete an Internal Request form which will be sent to the appropriate monitored cluster inbox linked to the child's home address.

CSE/Missing/DART – The Early Help Assessment process described in this document compliments the existing multi-agency CSE/DART and Missing processes but does not replace any of the existing pathways.

Step Down - The social worker will send the recent assessment and other relevant supporting documents (CP Plan, CIN Plan etc.) to the appropriate monitored cluster inbox linked to the child's home address.

Monitored Inboxes - The Family Solutions monitored inboxes are as follows:

FS.DudleyNorth@dudley.gov.uk

FS.DudleyCentral@dudley.gov.uk

FS.BrierleyHill@dudley.gov.uk

FS.Halesowen@dudley.gov.uk

FS.Stourbridge@dudley.gov.uk

Stage 2 – Cluster Administration

The Early Help Assessment/Assessment will be processed by the relevant Family Centre administration team. This will include initial screening of consent to share information with Early Help Partners, basic demographic information, cluster relevance via the Postcode Checker etc.

The Family Centre Manager/Senior Practice Supervisor will screen every Early Help Assessment and determine whether a resource is required from the Early Help partners across the cluster. Should there be a resource requirement, the child/ren and family will be discussed at the next Multi Agency Action Meetings (MAAM).

Stage 3 – Multi Agency Action Meeting

Multi Agency Action Meetings will take place regularly

The attendance will typically be:

DMBC Family Solutions - Family Centre Manager

DMBC Family Solutions - Senior Practice Supervisor

DMBC Family Solutions - Administrator

Health Representative (Health Visiting and School Nursing)

Housing

Community and Voluntary Sector (Cluster Based)

Education/Childcare/Additional Needs Representative (Cluster Based)

Other relevant cluster Early Help Partners

Step Down Prioritisation - Where cases are part of the social care step-down procedure, family support work will be prioritised and allocated outside of the MAAM to ensure there is no undue delay moving from CIN to Early Help. The details of the information would be shared at the following MAAM with the option of Early Help partners adding to the support plan at the MAAM.

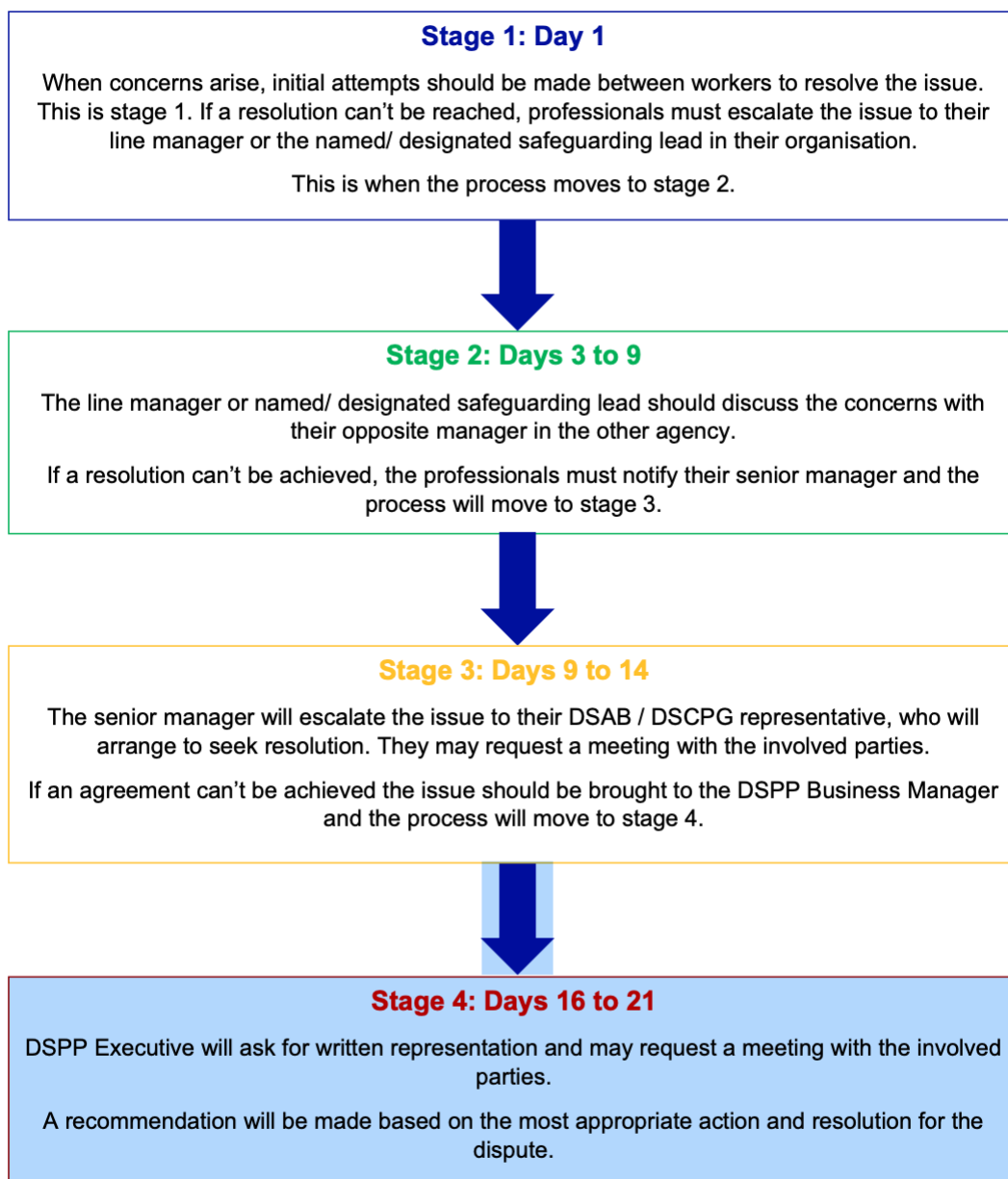
All other cases will be discussed at the MAAM with a multi-professional decision as to whether:

- A resource will be allocated from Early Help services
- What the resource is and who will deliver the resource
- Whether the resource will be delivered as a single or multiple agency response

Following the decision making process, the administrator will record the outcome and following the meeting inform the Lead Professional of the outcome by email.

Escalation Procedures

Should there be disagreement between the Lead Professional and the decision making process, the Lead Professional should follow Dudley Professional Challenge and Resolution process.



Appendix 5: the referrals procedure

If you are a child or young person or if you have concerns about a child or young person you should call the Children's Services Referral and Advice service on 0300 555 0050 during office hours (9.00am - 5.00pm).

Out of office hours you can contact the Emergency Duty Team on 0300 555 8574 or in an emergency call 999.

For practitioners and those working with children please complete the Multi-Agency Referral Form on <https://childrensocialcare.dudley.gov.uk/web/portal/pages/home>

Referrals can come from the child themselves, professionals such as teachers, the police, GPs and health visitors as well as family members and members of the public.

Referrals to Children's Social Care Services usually fall in to three categories:

- Requests for information from Children's social care;
- Provision of information such as notifications about a child;
- Requests, for services for a child, which will be in the form of a referral.

Children's social care has the responsibility to clarify with the referrer the nature of the concerns and how and why they have arisen.

The local Threshold Protocol provides guidance about the criteria for making and receiving referrals. Referrals should be confirmed in writing within 24 hours using the Multi Agency Referral Form.

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Appendix 7: Body Map

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always complete a body map on CPOMS but if that is not available please complete the hard copy and hand it over to the DSL who will scan it and save it in CPOMS.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

***At no time should an individual teacher/member of staff or school take photographic evidence of any injuries or marks to a child's person, the body map below should be used. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. Social Care direct or child's social worker if already an open case to social care.**

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and record

A copy of the body map should be kept on the child's concern/confidential file.

Also send it in with the Request for Help and Support if required.

BODYMAP

(This must be completed at time of observation)

Name of Pupil: _____

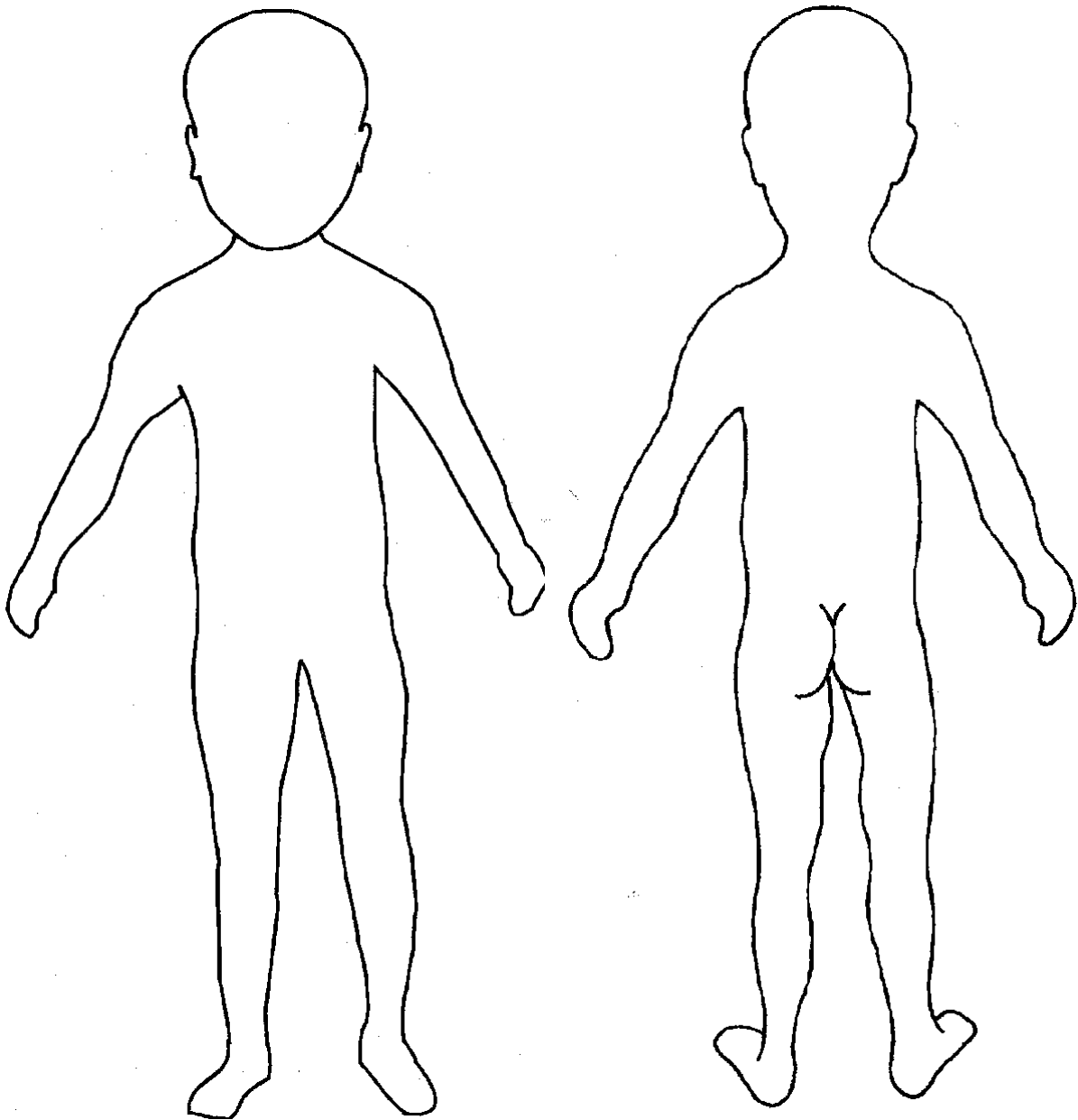
Date of

Birth: _____

Name of Staff: _____

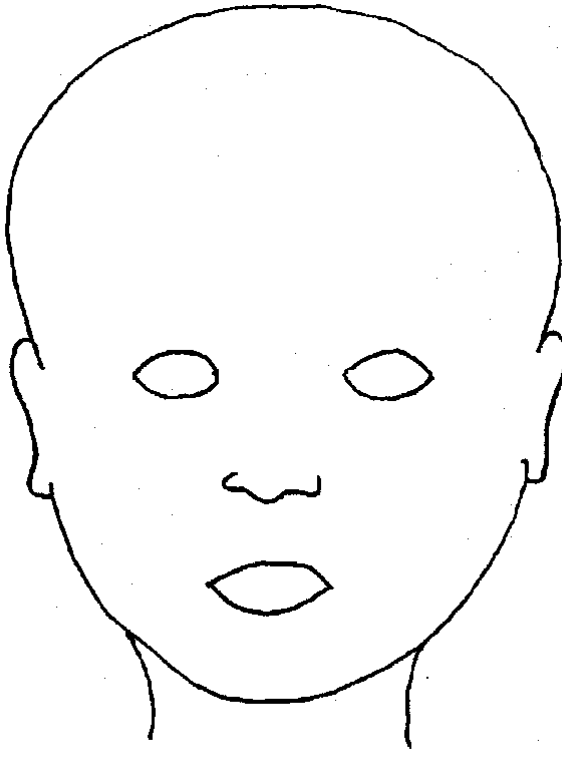
Job title: _____

Date and time of observation: _____

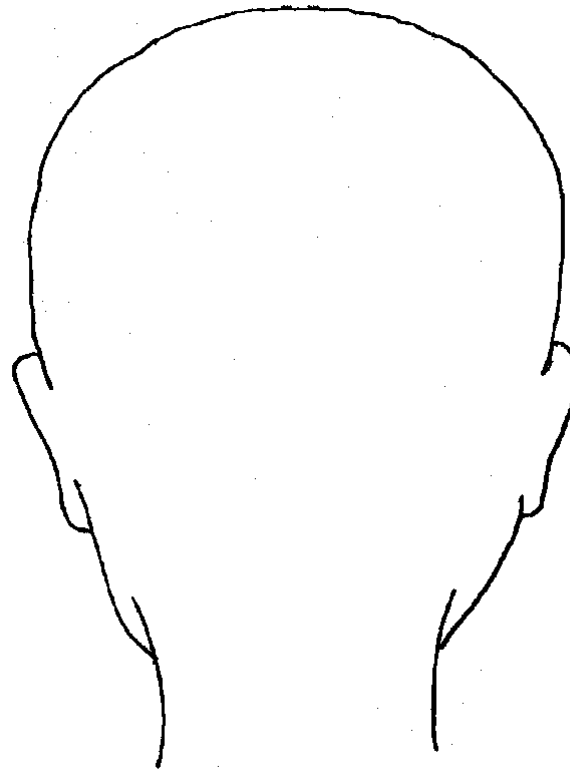


Name of pupil: _____

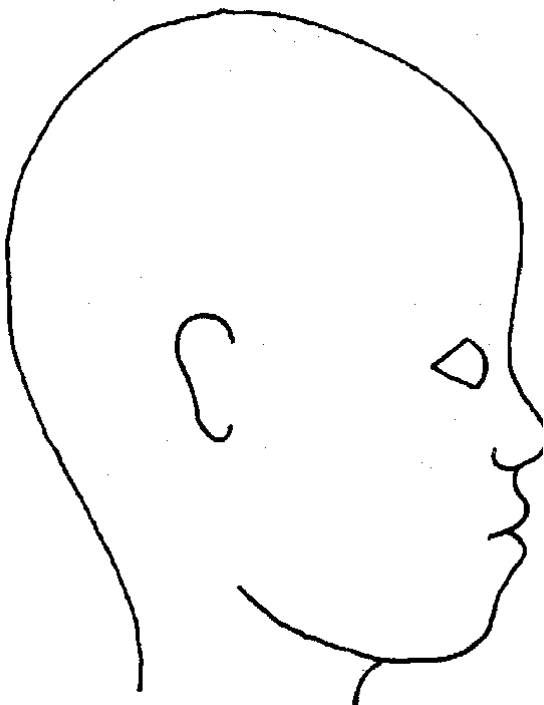
Date and time of
observation: _____



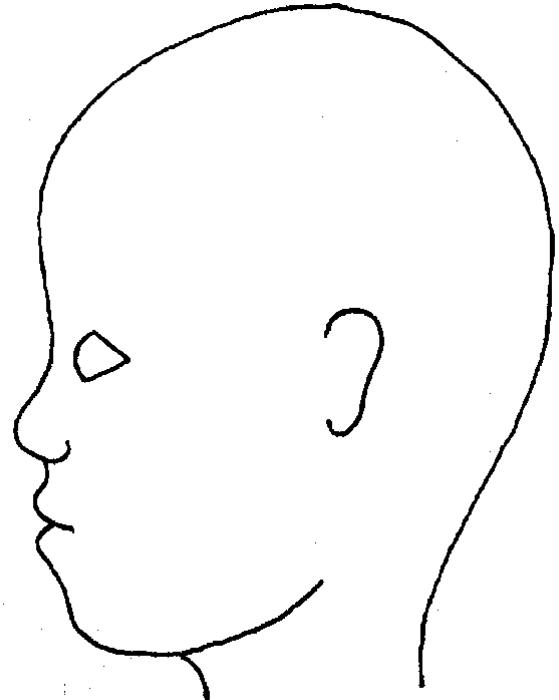
FRONT



BACK

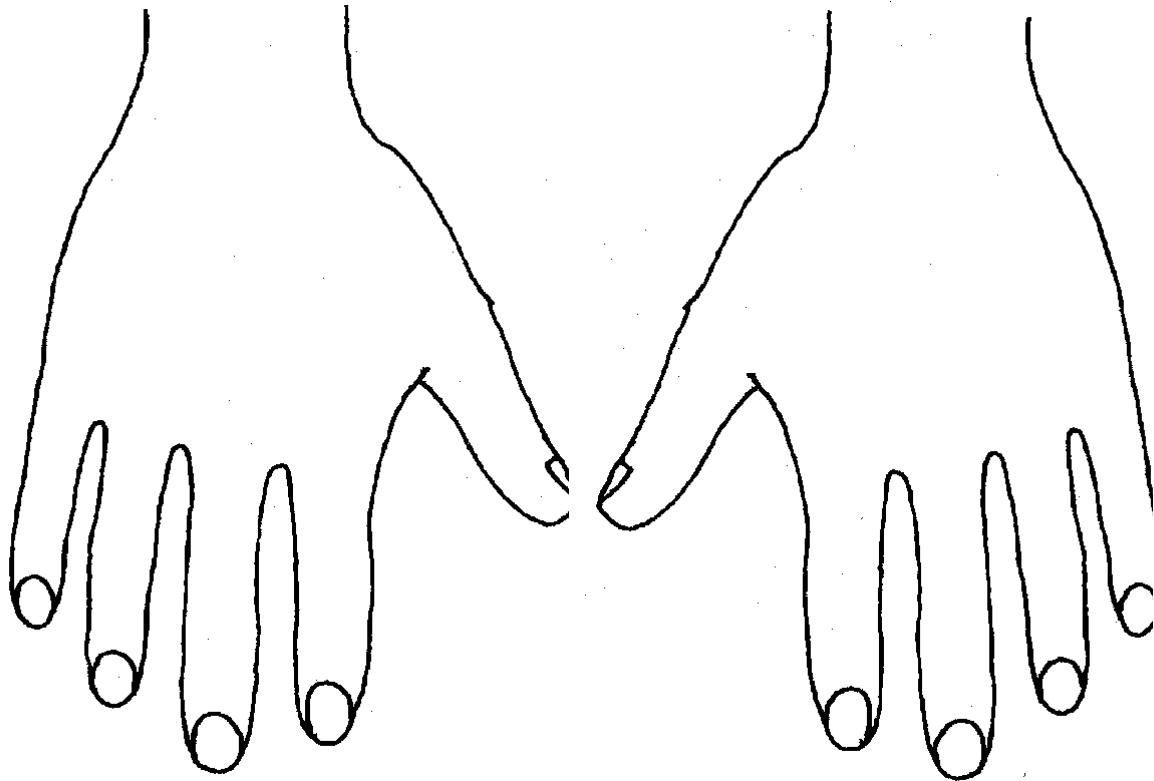


RIGHT



LEFT

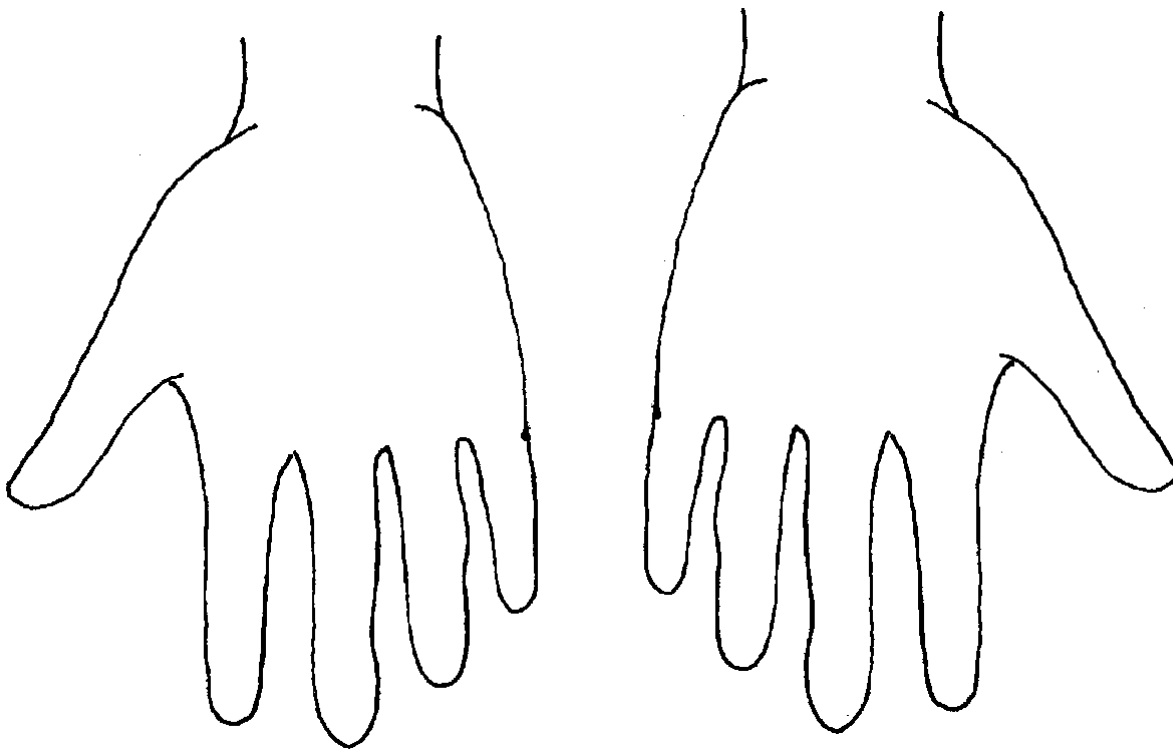
Name of pupil: _____ Date and time of observation: _____

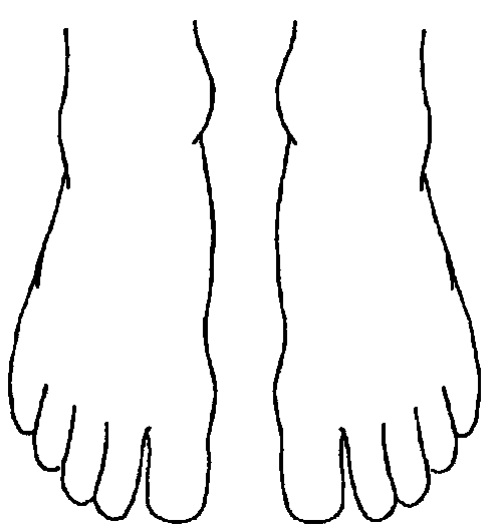


R

BACK

L

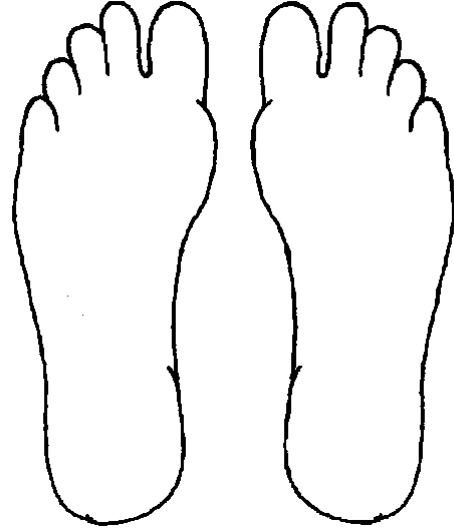




R

TOP

L



R

BOTTOM

L



R

INNER

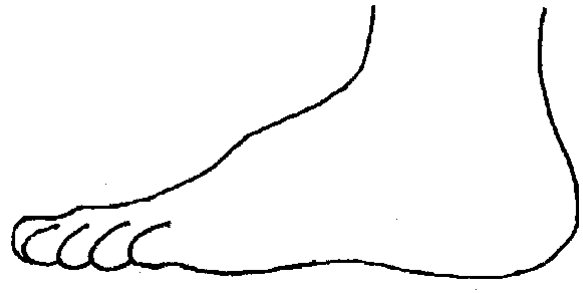


L



R

OUTER



L