

Safeguarding and

Child Protection

Policy

**Approved by: Board of Trustees Date: 6th September 2022**

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# Important contacts

**Organisation contacts**

All concerns about a child must be reported immediately to the Designated Safeguarding Lead. Where a child is in immediate danger or at risk of harm a referral should be made to children’s social care and /or the police immediately.

|  |  |  |
| --- | --- | --- |
| **Role** | **Name** | **Contact Details** |
| Designated  Safeguarding Lead (DSL) | Layo Segun | [layosegun@realaction.org.uk](mailto:layosegun@realaction.org.uk)  T: 020 8960 3282 / 07852 929 359 |
| Deputy Designated  Safeguarding Lead | Marilza Helena Pereia | T: 020 8960 3282 |
| Executive  Education Director | Katie Ivens | [Katie.ivens@gmail.com](mailto:Katie.ivens@gmail.com)  T: 020 8960 2065 |
| Named Safeguarding  Trustee | Dr. Sade Lamikanra | [Shining\_glory2004@yahoo.co.uk](mailto:Shining_glory2004@yahoo.co.uk)  M. 07403 599 237 |
| Chair of Board of Trustees | Patricia Calvo | [arceneguip@gmail.com](mailto:arceneguip@gmail.com)  07436 995 726 |

**Local Authority Contacts**

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| --- |
| **Westminster Access Team** Tel: 020 7641 4000 Out of hours Tel: 020 7641 6000  email: [AccesstoChildrenServices@westminster.gov.uk](mailto:AccesstoChildrenServices@westminster.gov.uk) |
| **For LADO consultations and referrals please contact the duty Child Protection   Adviser on: Aqualma Daniel Tel: 020 7641 7668** email: [LADO@westminster.gov.uk](mailto:LADO@westminster.gov.uk) |
| **Bi-Borough Safeguarding Lead for Schools and Education**  **Elaine Campbell** Telephone: 020 7361 3000/ Mobile: 07712 236 508  email: [elaine.campbell@rbkc.gov.uk](mailto:elaine.campbell@rbkc.gov.uk) |
| **Tri-borough Multi-Agency Safeguarding Hub (MASH)**  **Karen Duncan, Tri-Borough MASH Business Support Officer** Tel: 020 7641 3991 email: [kduncan1@westminster.gov.uk](mailto:kduncan1@westminster.gov.uk) |
| **Bi-Borough Admissions and Access to Education (Children Missing Education, Child Employment and Elective Home Education enquiries)**  **Wendy Anthony, Head of Admissions and Access to Education**  Tel: 020 7745 6440 email: [wendy.anthony@rbkc.gov.uk](mailto:wendy.anthony@rbkc.gov.uk) |
| **In an emergency call the police on 999** |

# Aims

The charity aims to ensure that:

* Appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
* Staff and volunteers are aware of their statutory responsibilities with respect to safeguarding.
* All Staff and volunteers are properly trained in recognising and reporting safeguarding issues.

# Legislation and statutory guidance

This policy is based on the Department for Education’s statutory guidance Keeping Children Safe in Education (2022), Working together to Safeguard Children (2018) and the London Child Protection Procedures. We comply with this guidance and the arrangements agreed and published by our local safeguarding partner.

This policy is also based on the following legislation:

* Section 175 of the Education Act 2002 places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
* The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
* The Children Act 1989 (and 2004 amendment), provides a framework for the care and protection of children.
* Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by Section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
* Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
* The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
* Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children.
* Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

# Definitions

**Safeguarding and promoting the welfare of children** means:

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

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will plan to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

* The local authority (LA).
* A clinical commissioning group for an area within the LA.
* The chief officer of police for a police area in the LA area.

# 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 will give special consideration to children who:

* Have special educational needs (SEN) or disabilities (see Section 9).
* 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.
* Are at risk due to either their own or a family member’s mental health needs.
* Are looked after or previously looked after (see Section 11).

# Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers and Board of Trustees and is consistent with the procedures of the Westminster City Council. Our policy and procedures also apply to off-site activities.

## All staff

All staff and volunteers will take responsibility to read and understand part 1 and Annex A of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education 2022, and the review of this guidance regularly.

All staff will be aware of:

* Our systems which support safeguarding, including this safeguarding and child protecton policy, the staff behaviour policy and code of conduct, the role and identityof the designated safeguarding lead (DSL) and deputy.
* The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
* The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
* What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
* The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization.

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

## The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. The DSL for Real Action is Layo Segun, General Manager. The DSL takes lead responsibility for safeguarding and child protection.

The DSL will be available during working hours for staff and volunteers to discuss any safeguarding concerns.

The DSL can be contacted outside of working hours via email: [layosegun@realaction.org.uk](mailto:layosegun@realaction.org.uk)

When the DSL is absent, the deputy DSL, Marilza Helena Perei, Project Coordinator English Express, should be contacted.

If the DSL and deputy are not available, Katie Ivens, Executive Education Director, will act as cover.

The DSL will be given the time, funding, training, resources, and support to:

* Provide advice and support to other staff on child welfare and child protection matters.
* Take part in strategy discussions and inter-agency meetings and support other staff to do so.
* Contribute to the assessment of children.
* Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also keep the Trustees informed of any issues and liaise with the local authority case managers and designated officers for child protection concerns as appropriate.

## The Board of Trustees

The Board of Trustees will approve this policy at each review, ensure it complies with the law.

The Board of Trustees will appoint a Trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL.

The Chair of the Board of Trustees will act as the ‘case manager’ if an allegation of abuse is made against the Education Director and the General Manager, where appropriate (see Appendix 3).

All Trustees will read Keeping Children Safe in Education 2022. Section 15 of this policy has information on how Trustees are supported to fulfil their role.

The Board of Trustees is responsible for the implementation of this policy through each Project Lead and the DSL, including:

* Ensuring that staff (including temporary staff) and volunteers are informed of the systems of Real Action which support safeguarding, including this policy, as part of their induction.
* Communicating this policy to staff, volunteers, parents when their child joins the Butterfly Saturday Reading school and via the Real Action’s 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 and volunteers 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).

# Confidentiality

* Timely information sharing is essential to effective safeguarding.
* Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
* The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
* If staff and volunteers need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
* Staff and volunteers should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests.
* The government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information and will support staff and volunteers who have to make decisions about sharing information.
* If staff and volunteers are in any doubt about sharing information, they should speak to the designated safeguarding lead (DSL) or deputy in the absence of the DSL.
* Confidentiality is also addressed in this policy with respect to record-keeping in Section 14, and allegations of abuse against staff in Appendix 3.

# Recognising abuse and taking action

Staff, volunteers, and Trustees must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL in the absence of the DSL)”.

## If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see Section 5.2) as soon as possible if you make a referral directly.

To report a concern about a child or young person in Westminster please contact:

Westminster Access Team – Tel: 020 7641 4000 Out of hours – Tel: 020 7641 6000

email: [AccesstoChildrenServices@westminster.gov.uk](mailto:AccesstoChildrenServices@westminster.gov.uk)

**For LADO consultations and referrals please contact the duty Child Protection Adviser: Aqualma Daniel Tel: 020 7641 7668 e**mail: [LADO@westminster.gov.uk](mailto:LADO@westminster.gov.uk)

**Bi-Borough Safeguarding Lead for Schools and Education: Elaine Campbell**

Telephone: 020 7361 3000/ Mobile: 07712 236 508 email: [elaine.campbell@rbkc.gov.uk](mailto:elaine.campbell@rbkc.gov.uk)

**Tri-borough Multi-Agency Safeguarding Hub (MASH) Karen Duncan, Tri-Borough MASH Business Support Officer** Tel: 020 7641 3991 email: [kduncan1@westminster.gov.uk](mailto:kduncan1@westminster.gov.uk)

**Bi-Borough Admissions and Access to Education (Children Missing Education, Child Employment and Elective Home Education enquiries):**  **Wendy Anthony, Head of Admissions and Access to Education** Tel: 020 7745 6440

email: [wendy.anthony@rbkc.gov.uk](mailto:wendy.anthony@rbkc.gov.uk)

**In an emergency call the police on 999.**

## If a child makes a disclosure to you

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

* Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
* Stay calm and do not show that you are shocked or upset.
* Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
* Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
* Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it.
* Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

## 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 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, and

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 4.

**Any staff or volunteer** who discovers (either through disclosure by the victim or visual evidence) 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 staff and volunteers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

**Any other member of staff or volunteer** 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 local safeguarding procedures.

The duty for staff and volunteers mentioned 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 and volunteers should not examine pupils.

**Any member of staff or volunteer** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

**Tri-borough FGM Rochelle-Ann** Senior Practitioner **Tel: 020 7641 1610**email: [rnaidoo@westminster.gov.uk](mailto:rnaidoo@westminster.gov.uk)   
or Tel: 020 7641 4000 [accesstochildrenservices@westminster.gov.uk](mailto:accesstochildrenservices@westminster.gov.uk)

## If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child’s welfare. Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the deputy or the Education Director or a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below) and share any action taken with the DSL as soon as possible.

**Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff and volunteers may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

In Westminster, the term early help is used to refer to any extra support people may need for their family. This can range from providing information, to support in the home or recommending courses that might be helpful for the family. The concerned family might already be using some of these services. Many organisations across Westminster provide early help and we try to work together to make it as easy as possible for you to get the right support, at the right time in the right place.

If you feel you need some extra support, you can gain further information about the Early Help service from your local Family Hub or children's centre.

**Queens’ Park Children’s Centre** 020 7641 5838 [officeqpcc@westminster.gov.uk](mailto:officeqpcc@westminster.gov.uk)

88 Bravington Road, W9 3AL

**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 7.1), you must tell the DSL as soon as possible.

The local authority will decide 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 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 person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

* Once an incident has been reported, the DSL will consult or report any disclosures by making a referral to:

**Westminster Children’s Services Duty, Referral and Assessment Team,**

Telephone: 020 7641 7669/7668

* **A Multi Agency Referral Form (MARF)** should be sent within 48 hours of the telephone referral to: Westmisnter Access Team – Tel: 020 7641 4000

Out of hours – Tel: 020 7641 6000

email: [AccesstoChildrensServices@westminster.gov.uk](mailto:AccesstoChildrensServices@westminster.gov.uk)

**For LADO consultations and referrals please contact the duty Child Protection Adviser on: Tel: 020 7641 7668 email**: [LADO@westminster.gov.uk](mailto:LADO@westminster.gov.uk)

## If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the deputy or in the absence of the deputy, a member of the senior leadership team and/or seek advice from local authority children’s social care.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ above). Inform the DSL or deputy as soon as practically possible after the referral.

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, which staff and volunteers can call to raise concerns about extremism with respect to a pupil or student. You can also email [counter.extremism@education.gov.uk](mailto: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.

**PREVENT** Kiran Malik Prevent Programme Manager, Westminster enquiries only

Tel: 020 7641 5071 email: [kmalik@westminster.gov.uk](mailto:kmalik@westminster.gov.uk)

## If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff and volunteers will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

**Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See Section 7.4 for what to do.)

You have concerns about a child.

Speak to the DSL.

You or the DSL makes a referral to the LA’s social Care Team (and call the police if appropriate).

Referral not required. Real Action takes relevant action and monitors locally.

Within 1 working day, a social worker decides about the type of response required.

If concerns escalate, make a referral.

No formal assessment required.

LA’s social care team takes action and informs the referrer.

School considers early help assessment and accesses other support as appropriate.

Staff keeps the child’s circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child’s best interest must always come first at all stage.

## Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a sessional staff or volunteer) posing a risk of harm to children, speak to the Project Manager. If the concerns/allegations are about the Project manager, speak to the General Manager, if the concern is about the General Manager, speak to the Board of Trustees.

The General Manager/Board of Trustees will then follow the procedures set out in Appendix 3, if appropriate. Where appropriate, Real Action will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 3 for more detail).

## Allegations of abuse made against other pupils

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

* Is serious, and potentially a criminal offence.
* Could put pupils in the school at risk.
* Is violent.
* Involves pupils being forced to use drugs or alcohol.
* Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including sexting).

If a pupil makes an allegation of abuse against another pupil:

* You must record the allegation and tell the DSL, but do not investigate it.
* The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
* The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
* The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

We will minimise the risk of child-on-child abuse by:

* Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
* Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
* Ensuring our teachings help to educate pupils about appropriate behaviour and consent.
* Ensuring pupils know they can talk to staff and volunteers confidentially.
* Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

## Sexting

**Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

* View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
* Delete the imagery or ask the pupil to delete it.
* Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility).
* Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
* Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff or volunteer. This meeting will consider the initial evidence and aim to determine:

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

The DSL will make an immediate referral to police and/or children’s social care if:

* The incident involves an adult.
* There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
* What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage or are violent.
* The imagery involves sexual acts and any pupil in the imagery is under 13.
* The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the project lead and other members of staff or volunteers as appropriate, may decide to respond to the incident without involving the police or children’s social care.

**Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children’s social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children’s social care and/or the police immediately.

**Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done safely through the DSL.

**Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in Section 14 of this policy also apply to recording incidents of sexting.

# Notifying parents

Where appropriate, we will discuss any concerns about a child with the child’s parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff and volunteers will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children’s social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

# Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration.
* Pupils being more prone to peer group isolation than other pupils.
* The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
* Communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for pupils with SEN and disabilities.

# Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child’s experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL, and all members of staff and volunteers will work with and support social workers to help protect vulnerable children.

# Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe.

# Mobile phones and cameras

Staff are allowed to bring their personal phones to work or Saturday school for their own use but will limit such use to non-contact time when pupils are not present. Staff members’ personal phones will remain in their bags, pockets or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

No Real Action cameras will be taken off site unless agreed by the DSL.

All staff will read the acceptable use policy.

# Complaints and concerns about Real Action safeguarding policies

## 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).

## Other complaints

Other complaints will be dealt with on individual merit and in conjunction with policy. The school will refer to Westminster’s Local Safeguarding Children Board for advice and guidance.

Westminster - [accesstochildrensservices@westminster.gov.uk](mailto:accesstochildrensservices@westminster.gov.uk) or tel: 020 7641 4000

## Whistle-blowing

Real Action acts in accordance with its Whistle- blowing policy.

# 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. 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.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the Saturday school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Record-keeping arrangements:

* Records are kept on an encrypted system and locked in individual’s folders.
* Information will be kept while the child is at the school and shared if necessary when they leave.
* Records are kept confidential when appropriate.

The school shares information with other agencies when this is appropriate, in line with your local safeguarding procedures.

In addition:

* Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
* Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

# Training

## All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand Real Action’s safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our safeguarding partners.

Staff will also receive updates on safeguarding and child protection (for example, through emails, and staff meetings) as required.

Volunteers will receive appropriate training, where applicable.

## The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

## Board of Trustees

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

As the Chair of the Trustees may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the Education Director or General Manager, they receive training in managing allegations for this purpose.

## Recruitment – interview panels

At least one person conducting any interview for a post at Real Action will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

## Staff who have contact with pupils and families

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

# Monitoring arrangements

This policy will be reviewed **annually** by the DSL and Trustees. At every review, it will be approved by the full Board of Trustees.

# Links with other policies

This policy links to the following policies and procedures:

* Behaviour
* Staff and volunteers code of conduct
* Complaints
* Health and safety
* Online safety
* Equality
* First aid
* Whistle-blowing
* Anti-bullying

**These Appendices are based on the Department for Education’s statutory guidance, Keeping Children Safe in Education.**

# Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

* Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
* Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.
* Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
* Seeing or hearing the ill-treatment of another.
* Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

* Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
* Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

* Provide adequate food, clothing and shelter including exclusion from home or abandonment.
* Protect a child from physical and emotional harm or danger.
* Ensure adequate supervision (including the use of inadequate care-givers).
* Ensure access to appropriate medical care or treatment.

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

# Appendix 2: safer recruitment and DBS checks – policy and procedures

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

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, 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 ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual’s personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

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. The references requested will ask specific questions about the suitability of the applicant to work with children.

**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; or
* Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
* 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:

* We believe the individual has engaged in relevant conduct; or
* The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2008; or
* The ‘harm test’ is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
* 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 Real Action 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.

We will check the identity of all contractors and their staff on arrival at the Butterfly Saturday Reading school. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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 2018 Childcare Disqualification Regulations 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.
* Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
* Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations 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.

Board of Trustees

All Trustees will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

# Appendix 3: allegations of abuse made against staff

This section of the Policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

* Behaved in a way that has harmed a child, or may have harmed a child, or
* Possibly committed a criminal offence against or related to a child, or
* Behaved towards a child or children in a way that indicates he or she 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 Real Action. Allegations against a staff or volunteer who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Suspension of the accused until the case is resolved

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 Real Action 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 Real Action so that they do not have unsupervised access to children.
* Moving the child or children to classes where they will not meet the individual, making it clear that this is not a punishment and parents have been consulted.

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).
* **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the General Manager (or chair of Board of Trustees where the Education Director or General Manger 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 Saturday reading 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 Real Action and their contact details.
* **If it is decided that no further action is to be taken** regarding 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 Real Action 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 considering what other support is appropriate. Individuals can access Westminster Talking Services for support as well as their union.
* 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 Real Action 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 Teaching Regulation Agency.

Where the police are involved, wherever possible the Board of Trustees 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.

**Additional considerations for supply staff**

If there are concerns or an allegation is made against someone not directly employed by Real Action, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

* We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome.
* The Board of Trustees will discuss with the agency whether it is appropriate to suspend the supply teacher, while the Real Action carries out the investigation.
* We will involve the agency fully, but Real Action will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.
* We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

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, considering 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 Real Action ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and Real Action’s DSL 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 they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and Real Action DSL will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency 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 process.

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 Saturday school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the General Manager, or other appropriate person in the case of an allegation against the Education Director or General Manager, 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

Real Action 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, Real Action will retain the records of the case on the individual’s confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other 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: specific safeguarding issues

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

* Appearing with unexplained gifts or new possessions.
* Associating with other young people involved in exploitation.
* Suffering from changes in emotional wellbeing.
* Misusing drugs and alcohol.
* Going missing for periods of time or regularly coming home late.
* Regularly missing school or education.
* Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim’s immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

* Having an older boyfriend or girlfriend.
* Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare.

The DSL deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children’s social care.

So-called ‘honour-based’ abuse (including FGM and forced marriage)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

**FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

* A pupil confiding in a professional that FGM has taken place.
* A mother/family member disclosing that FGM has been carried out.
* A family/pupil already being known to social services in relation to other safeguarding issues.
* A girl:
  + Having difficulty walking, sitting or standing, or looking uncomfortable.
  + Finding it hard to sit still for long periods of time (where this was not a problem previously).
  + Spending longer than normal in the bathroom or toilet due to difficulties urinating.
  + Having frequent urinary, menstrual or stomach problems.
  + Avoiding physical exercise or missing PE.
  + Being repeatedly absent from school or absent for a prolonged period.
  + Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
  + Being reluctant to undergo any medical examinations.
  + Asking for help, but not being explicit about the problem.
  + Talking about pain or discomfort between her legs.

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

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

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

**Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff or volunteer suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

* Speak to the pupil about the concerns in a secure and private place.
* Activate the local safeguarding procedures and refer the case to the local authority’s designated officer.
* Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

Preventing radicalisation

* **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
* **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
* **Terrorism** is an action that:
  + Endangers or causes serious violence to a person/people;
  + Causes serious damage to property; or
  + Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

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

We will assess the risk of children in our Saturday school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

Staff will be alert to changes in pupils’ behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

* Refusal to engage with, or becoming abusive to, peers who are different from themselves.
* Becoming susceptible to conspiracy theories and feelings of persecution.
* Changes in friendship groups and appearance.
* Rejecting activities they used to enjoy.
* Converting to a new religion.
* Isolating themselves from family and friends.
* Talking as if from a scripted speech.
* An unwillingness or inability to discuss their views.
* A sudden disrespectful attitude towards others.
* Increased levels of anger.
* Increased secretiveness, especially around internet use.
* Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
* Accessing extremist material online, including on Facebook or Twitter.
* Possessing extremist literature.
* Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff and volunteers are concerned about a pupil, they will follow our procedures set out in Section 7.5 of this policy, including discussing their concerns with the DSL.

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

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

Visitors are expected to sign the visitors’ screen and wear a visitor’s badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

* Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
* The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors will be always accompanied by a member of staff or volunteer. We will not invite into Real Action any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using Real Action facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

* Contact the family and their emergency contact.
* If we still cannot make, contact with the family or another identified person on Real Action system we will contact social services.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will make immediate contact with:

**Bi-Borough Admissions and Access to Education (Children Missing Education, Child Employment and Elective Home Education enquiries): Wendy Anthony, Bi-Borough Head of Admissions and Access to Education** Tel: 020 7745 6440 email: [wendy.anthony@rbkc.gov.uk](mailto:wendy.anthony@rbkc.gov.uk%20)

**In an emergency call 999**

# Appendix 5: Record of Concern

Staff and volunteers should use this form to record any concerns related to Safeguarding and Child Protection. It should then be physically handed to the Designated Safeguarding Lead or the Deputy in the absence of the Designated Safeguarding Lead. Copies of this form are kept at the reception of the Learning Store and with the Project Manager of the Butterfly Saturday Reading School.

 Record of Concern

|  |
| --- |
| Child’s Name: |
| Class: |
| Date and time of concern: |
| Your account of the concern: (what was said, observe, reported and by whom)    Continue on a separate sheet if needed |
| Your response: (what did you do/say following the concern) |
| Name: Signature: |
| Position: |
| Date and time of reporting: |
| Action and response of the Designated Safeguarding Lead: |
| Name: Date: |