



## SAFEGUARDING AND PROMOTING STUDENT WELFARE POLICY

Responsible: Acting Principal

Amended: September 2022

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## 1. INTRODUCTION

Safeguarding is defined as protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

This Safeguarding and Promoting Student Welfare Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the WUTC. All staff should be aware of systems within the WUTC which support safeguarding; and these should be explained to them as part of staff induction. It will include:

- child protection policy, which should amongst other things also include the policy and procedures to deal with child-on-child abuse;
- behaviour policy which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing as well as acceptable use of technologies, staff/pupil relationships and communications including the use of social media;
- safeguarding response to children who go missing from education; and also important that staff determine how best to build trusted relationships with children and young people which facilitates communication;
- role of the DSL including the identity of the DSL and any DDSLs.
- copy of Part One Keeping Children Safe in Education (2022). Annex B Further information
- Annex A, condensed version of Part one of KCSiE (DfE 2022). It can be provided (instead of Part one) to those staff who do not directly work with children.

### **Purpose of a Safeguarding Policy**

To inform staff, parents, volunteers and governors about the WUTC's responsibilities for safeguarding children.  
To enable everyone to have a clear understanding of how these responsibilities should be carried out.

### **Hertfordshire Safeguarding Children Partnership Inter Agency Child Protection Procedures.**

The WUTC follows the procedures established by the Hertfordshire Safeguarding Partnership (HSCP); a guide to procedures and practice for all agencies in Hertfordshire working with children and their families. <https://hertsscb.proceduresonline.com/index.htm>

**WUTC Staff & Volunteers**

All staff, including supply staff, volunteers and contract workers have a responsibility to provide a safe environment in which students can learn.

WUTC staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.

All staff will receive appropriate safeguarding children training, including online safety (which is updated regularly – Hertfordshire Safeguarding Children Partnership advises every three years), so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Supply staff, contractors and volunteers will be made aware of the safeguarding policies and procedures by the Designated Senior Person -including Safeguarding Policy and staff code of conduct.

**Mission Statement**

Establish and maintain an ethos and culture where children feel secure, are encouraged to talk, and are listened and responded to when they have a worry or concern.

Establish and maintain an ethos and culture where staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and well-being of a student.

Ensure students know that there are adults in the school whom they can approach if they are worried or concerned.

Ensure that students, who have additional/unmet needs are supported appropriately. This could include referral to early help services or Child Protection Contacts to specialist services if they are a child in need or have been/are at risk of being abused and neglected.

Consider how students may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

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

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### **Implementation, Monitoring and Review of the Safeguarding Policy**

The policy will be reviewed annually by the governing body. It will be implemented through the WUTC's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Senior Person and through staff performance measures.

Training for all staff takes place at least once annually at the start of the academic year and there are regular safeguarding training updates throughout the academic year each half term through our weekly Teaching & Learning programme and Staff Training Days that are on the calendar at the start of every academic term.

Appropriate staff also participate in external training lead by Herts for Learning, NSPCC and other recognised providers.

## 2. STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of students, WUTC will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157)  
*Outlines that Local Authorities and School Governing Bodies have a responsibility to “ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils”.*
- Hertfordshire Safeguarding Partnership Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)
- Keeping Children Safe in Education (DfE, September 2022)
- Keeping Children Safe in Education: Part One - information for all school and college staff (DfE, September 2022) – APPENDIX 1
- Working Together to Safeguard Children (DfE 2018)
- The Education (Pupil Information) (England) Regulations 2005
- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to **marry**. Includes taking someone overseas to force them to **marry** (whether or not the **forced marriage** takes place).
- Serious Violence Strategy 2018
- Sexual violence and sexual harassment between children in schools and colleges (DfE 2021)
- Equality Act 2010 (including the Public Sector Equality Duty)
- The Human Rights Act 1998
- Apprenticeships, Skills, Children and Learning Act 2009

## 3. THE DESIGNATED SENIOR PERSON (DSP) - N.B. Keeping Children Safe in Education, DfE 2022 refers to this role as Designated Safeguarding Lead (DSL)

Governing bodies and proprietors should ensure that the WUTC designates an appropriate senior member of staff to take lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

During term time the designated safeguarding lead and or a deputy will always be available (during WUTC hours) for staff to discuss any safeguarding concerns and individual arrangement for out of hours/out of term activities will be able to contact the DSP/DDSP via email:

**[lisa.williams@watforduttc.org](mailto:lisa.williams@watforduttc.org) or [paul.quinn@watforduttc.org](mailto:paul.quinn@watforduttc.org).**

Alternatively, call Hertfordshire Children’s Services on: 0300 123 4043

**The Designated Senior Person (DSP)/Designated Safeguarding Lead (DSL) for Child Protection in this school is: Lisa Williams**

There should be a Deputy Designated Senior Person (DDSP)/Deputy Designated Safeguarding Lead (DDSL) in the absence of the lead DSP/DSL. **The DDSP/DDSL for Child Protection in this school are: Paul Quinn and Melissa Couronne.**

The broad areas of responsibility for the DSP/DSL are:

- Managing Child Protection Contact Referrals and cases
- Contacting the Child Protection Consultation Hub when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- Completing Child Protection Contact Referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern
- Liaise with the Principal to inform them of issues - especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection Contact Referral by liaising with relevant agencies
- Support staff who make Child Protection Contact Referrals and other service referrals
- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child or those currently working with a social worker

### ➤ **Training KCSiE (DFE, 2022)**

The DSP/DSL should undergo formal training every two years. The DSP/DSL should also undertake Prevent awareness training every 3 years and Home Office online training on an annual basis as a minimum. In addition to this training, their knowledge and skills should be refreshed (for example via e-bulletins, meeting other DSPs/DSLs, or taking time to read and digest safeguarding developments) at least annually to:

The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

1. Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
2. Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

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3. Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
4. Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
5. Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
6. Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
7. (Full details in Chapter one of **Working Together to Safeguard Children**)
8. Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalization
9. Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
10. Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
11. Obtain access to resources and attend any relevant or refresher training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
12. Ensure each member of staff has access to and understands the school's or college's safeguarding and child protection policy and procedures, especially new and part time staff
13. Be able to keep detailed, accurate, secure written records of concerns and referrals
14. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

### ➤ **Raising Awareness**

- The designated safeguarding person should ensure that all staff including part time, contractors, volunteers and supply staff are aware of the WUTC's policies and that they are known, understood and used appropriately.
- Ensure the WUTC's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the safeguarding and child protection policy is available publicly and parents are aware

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that advice regarding early help and child protection concerns could be sought from the Consultation Hub. Referrals about suspected abuse or neglect may be made and the statutory role of the school in safeguarding children.

- Link with the Local Safeguarding Children's Partnership (HSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff. The DSL/DDSL should have details of the child's social worker and the name of the virtual school's head in the authority that looks after the child.
- Where children leave the WUTC, ensure the file for safeguarding and any child protection information is sent to any new school /college as soon as possible but transferred separately from the main pupil file. The file should not be sent until the child is physically attending the new school.
- Schools should obtain proof that the new school/education setting has received the safeguarding file for any child transferring and then destroy any information held on the child unless the case is currently open and in line with data protection guidelines (see Record keeping Guidance on Hertfordshire Grid for Learning for further information).
- Consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.



#### 4. THE GOVERNING BODY

Governing bodies and proprietors must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

Governing bodies and proprietors should have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools or college's safeguarding arrangements.

**All** governors and trustees should receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

**The nominated governor for child protection is: Ash Patil**

The responsibilities placed on governing bodies and proprietors include:

- ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare e.g.
  - Child protection policy in place
  - Staff behaviour policy (sometimes called employee code of conduct)
  - Part one
- OR
- Annex A (The following is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children (if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.) of KCSiE (DfE, 2022)
- Annex B KCSiE (DfE, 2022) on specific safeguarding issues
- Information regarding the role and identity of the designated safeguarding lead (and any deputies), **should be provided to all staff on induction**
- The Principal should ensure that the above policies and procedures, adopted by governing bodies and proprietors, and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements
- According to the Equality Act, schools and colleges **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal

- The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.
- Ensure that the school or college contributes to multi-agency working in line with statutory guidance **Working Together to Safeguard Children (DfE,2018)**.
- New safeguarding partners and child death review partner arrangements are in place
- Should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners
- Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
- Ensuring arrangements are in place that set out clearly the and principles for sharing information within the school or college and with the three safeguarding partners, other organisations, agencies and practitioners as required.
- Where children leave WUTC, the designated safeguarding lead should ensure their child protection file is transferred to the new school or FE college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or FE college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and FE colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in an FE college, are aware as required.
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or FE college in advance of a child leaving. For example, information that would allow the new school or FE college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives.
- Ensure that all staff undergo child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners (HSCP) 3 years.
- All staff should receive regular safeguarding and child protection updates (for example, via email, e-

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bulletins, staff meetings) as required, and at least annually

- Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- Ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum. Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) Mandatory since September 2020.
- Governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- Ensure school have written recruitment and selection policies and procedures in place and at least one of the persons who conducts an interview has completed safer recruitment training
- Should ensure there are procedures in place (as described in part 4 of KCSiE) to manage concerns and allegations against staff including volunteers and supply staff
- There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. (refer to *Type of DBS checks* in KCSiE (DfE 2022) pg. 57
- All staff should be clear about their school's or college's policy and procedures with regard to child on child abuse.
- 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. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.
- Ensuring that all of the DSLs, including deputies, should undergo formal child protection training every two years, in line with KCSiE and HSCP procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments, for example.
- Prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. Additional information to support governing bodies and proprietors is provided in Part 2 of KCSiE (DfE 2022).
- **Child-on-child abuse**
- **All** staff should recognise that children are capable of abusing other children (including online). All staff should be clear about their school's or college's policy and procedures with regard to child-on-child abuse.

## 5. WHEN TO BE CONCERNED

All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology maybe used to facilitate offline abuse. Children maybe abused by an adult or adults or by another child or children.

Physical abuse	
A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	
Indicators in a child/ young person	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness

Emotional abuse
The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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 children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators in a child/ young person	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a ‘loner’ Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour
<p style="text-align: center;"><b>Neglect</b></p> <p>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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p>	
Indicators in a child/ young person	
Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

### Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.

#### Indicators in a child/ young person

Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in schoolwork habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	

If staff have any concerns about a child's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the DSL/DDSL. The DSL/DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to a safeguarding concern.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experience as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Staff therefore should have professional curiosity and speak with the DSL if they have concerns. It is also important that staff determine how best to build a trusted relationship with the young people to facilitate communication.

**Any staff member should be able to make a Child Protection Contact Referral to Children's Services if necessary.**

All staff should be aware of the process for making Child Protection Contact Referrals to Children's Services for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a Contact Referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.



**Options will then include:**

- Managing any support for the child internally via the school or college's own pastoral support processes.
- Completing a Families First Assessment or making a request for early help support.
- A Child Protection Contact Referral for statutory services, for example as the child might be in need of services, or suffering / likely to suffer significant harm from abuse or neglect.

**Extra Familial Harm (formerly contextual Safeguarding)**

Safeguarding incidents and/or behaviors can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the DSLs and their Deputies should be considering the context within which such incidents and/or behaviors occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

**A child centered and coordinated approach to safeguarding:**

Safeguarding and promoting the welfare of children is **everyone's responsibility**. In order to fulfil this responsibility effectively, all professionals should make sure their approach is **child centered**. This means that they should consider, at all times, what is in the best interests of the child.

Schools and colleges and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests** of the child at all times.

**Children who may require early help**

Families First is Hertfordshire's strategy for early help services for families.

A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) and will help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Senior Person any ongoing/escalating concerns so that consideration can be given to a Child Protection Contact Referral to Children's Services if the child's situation doesn't appear to be improving. If early help is appropriate, the DSL or a Deputy will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

Staff and volunteers working within the WUTC should be alert to the potential need for early help for children also who are more vulnerable. For example:



- ❖ Children with a disability and/or specific additional needs.
- ❖ Children with special educational needs.
- ❖ Children who have a mental health need
- ❖ Children who are acting as a young carer.
- ❖ Children who are showing signs of engaging in anti-social or criminal behavior, including gang involvement and association with organised crime groups or county lines.
- ❖ Children who are frequently missing/go missing from care or home
- ❖ Children who at risk of modern slavery, trafficking or criminal exploitation
- ❖ Children who have a family member in prison, or is affected by parental offending
- ❖ Children whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic abuse
- ❖ Children who are showing early signs of abuse and/or neglect.
- ❖ Children who are at risk of being radicalised or exploited.
- ❖ Children who are misusing drugs or alcohol themselves
- ❖ Children who have returned home to their family from care
- ❖ Children who are privately fostered
- ❖ is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- ❖ is persistently absent from education, including persistent absences for part of the school day.

Staff members should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect**. They should also be aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.

**Children with special educational needs and disabilities:**

Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

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

- ❖ Reluctance to challenge carers , (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- ❖ Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- ❖ A disabled child's understanding of abuse.
- ❖ Lack of choice/participation
- ❖ Isolation

### Child-on-child abuse

**All** staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

**All** staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their DSL (or DDSL).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- ❖ **All** staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:
  - Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
  - Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
  - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
  - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

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- Up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (sexting or youth produced sexual imagery)
- Initiation/hazing type violence and rituals.
- ❖ All staff should be aware that abuse is abuse and child-on-child abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Furthermore, they should *recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators), but that all child on child abuse is unacceptable and will be taken seriously.*

### **In order to minimise the risk of child-on-child abuse the WUTC:**

- ❖ Provides a developmentally appropriate Decision Making programme which develops students understanding of acceptable behaviour and keeping themselves safe.
- ❖ Have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued.
- ❖ Develop robust risk assessments where appropriate (e.g. Using the Risk Assessment Management Plan and Safety and Support Plan tools).
- ❖ Have relevant policies in place (e.g. behaviour for learning policy).

Responses to allegations of sexual violence or harassment will follow the school procedures for safeguarding.

### **The DSL will:**

- When responding to concerns relating to child-on-child sexual violence or harassment, The WUTC will follow the guidance outlined in Part five of KCSIE 2022.
- The WUTC recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' We recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school/college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- The WUTC recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.
- The WUTC recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain

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children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation

- The DSL (or DDSL) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and HSCP procedures.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the school/college and where necessary will be referred to Children's Services and/or the police.

### **Important considerations which may influence this decision include:**

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult students, or school/ college staff
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The WUTC will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Services and/or the police) to ensure a consistent approach is taken.

## **Serious Violence**

Staff members should be aware of indicators that may signal that children are at risk from, or involved in serious violent crime. Indicators include:

- ❖ Increased absence from school
- ❖ A change in friendship
- ❖ Relationships with older individuals or groups
- ❖ Significant decline in performance
- ❖ Self-harm, significant change in well-being or signs of assault or unexplained injuries
- ❖ Unexplained gifts and new possessions

Support for the young person will be tailored on a case by case basis and may include:

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- ❖ Referring students to appropriate staff in school who can offer emotional and pastoral support
- ❖ Ensuring that parents are fully aware of any incidences and included in the decision making of how to support students
- ❖ Making referrals to external agencies
- ❖ Close monitoring and support for students for an extended period of time afterwards
- ❖ Appropriate interventions put in place.

Further guidance and responding to sexual violence and harassment between children in schools can be found at:

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, 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. It can involve force and /or enticement-based methods of compliance and could be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. Exploitation as well as being physical can be facilitated and/or take place on line. More information include definitions and indicators are included in Annex B KCSiE DfE 2022.

#### **In order to minimise the risk of CSE and CCE at the WUTC:**

- ❖ Provides a developmentally appropriate Decision Making programme which develops students understanding of keeping themselves safe.
- ❖ Have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued.

#### **Responses to allegations of CSE and CCE will follow the school procedures for safeguarding.**

#### **The DSL will:**

- ❖ Take detailed statements from students
- ❖ Make and keep detailed records of all information gathered
- ❖ Liaise with all necessary stakeholders and agencies including the parents of students involved
- ❖ Safeguarding and supporting students

Support for the young person will be tailored on a case by case basis and may include:

- ❖ Referring students to appropriate staff in school who can offer emotional and pastoral support
- ❖ Ensuring that parents are fully aware of any incidences and included in the decision making of how to support students
- ❖ Making referrals to external agencies
- ❖ Close monitoring and support for students for an extended period of time afterwards

- ❖ Appropriate interventions put in place

## **Mental Health**

Staff members should be aware that 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.

Support for the young person will be tailored on a case by case basis and may include:

- ❖ Referring students to appropriate staff in school who can offer support
- ❖ Making referrals to trained professionals
- ❖ Making referrals to external agencies
- ❖ Appropriate interventions put in place.

## **Prevent: Safeguarding Children and Young People from Radicalisation**

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.” Pg 133 KCSiE (DfE 2022).

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may be in need of Prevent support. They must act proportionately to the concern using the Prevent ‘notice, check, share’ approach, which may lead to the DSL making a Prevent referral.

**[https://hertsscb.proceduresonline.com/chapters/p\\_prevent\\_guide.html](https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html)**

## **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. This abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

See Appendix 4 for information regarding Operation Encompass.

## 6. DEALING WITH A DISCLOSURE

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a student discloses that he or she has been abused in some way, the member of staff / volunteer should:

- ❖ Listen to what is being said without displaying shock or disbelief
- ❖ Accept what is being said
- ❖ Allow the student to talk freely
- ❖ Reassure the student, but not make promises which it might not be possible to keep
- ❖ Never promise a student that they will not tell anyone - as this may ultimately not be in the best interests of the student.
- ❖ Reassure him or her that what has happened is not his or her fault
- ❖ Stress that it was the right thing to tell
- ❖ Listen, only asking questions when necessary to clarify
- ❖ Not criticise the alleged perpetrator
- ❖ Explain what has to be done next and who has to be told
- ❖ Make a written record (see Record Keeping)
- ❖ Pass the information to the Designated Senior Person without delay (if a DSL or Deputy is not available, staff must inform a senior member of staff or complete a child protection contact referral if this disclosure indicates that the child may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

### Third Party Disclosures

It's everyone's responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse.

Therefore, when safeguarding concerns are shared to the DSL in the WUTC by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the WUTC. If unsure of how to do this speak to the DSL / Acting Principal and they will advise accordingly.



## Support

Dealing with a disclosure from a student, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL

**If a school /college staff member receives a disclosure about potential harm caused by another staff member, they should see section 11 of this policy – *Allegations involving school staff/supply staff/volunteers*.**

## 7. RECORD KEEPING

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

When a student has made a disclosure, the member of staff/volunteer should:

- ❖ Record as soon as possible after the conversation. Use the WUTC CPOMS system wherever possible.
- ❖ Do not destroy the original notes in case they are needed by a court
- ❖ Record the date, time, place and any noticeable non-verbal behaviour and the words used by the student
- ❖ Draw a diagram to indicate the position of any injuries
- ❖ Record statements and observations rather than interpretations or assumptions

All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

## 8. CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

- ❖ All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police).
- ❖ If a student confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the student in a manner appropriate to the student's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep them or other children safe. This may ultimately not be in the best interests of the student.
- ❖ Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

## 9. WUTC PROCEDURES

*Please see Appendix 3: What to do if you are worried a child is being abused : flowchart.*

If any member of staff is concerned about a student he or she must inform the Designated Senior Person. The DSP/DSL will decide whether the concerns should be referred to Children's Services: Safeguarding and Specialist Services. If it is decided to make a referral to Children's Services: Safeguarding and Specialist Services this will be discussed with the parents, unless to do so would place the student at further risk of harm.

While it is the DSPs/DSLs role to make Child Protection Contact Referrals, any staff member can make a referral to Children's Services. If a child is in immediate danger or is at risk of harm (e.g. concern that a family might have plans to carry out FGM), a referral should be made to Children's Services and/or the Police immediately. Where Child Protection Contact Referrals are not made by the DSP/DSL, the DSP/DSL should be informed as soon as possible.

If a **teacher** ( persons employed or engaged to carry out teaching work at schools and other institutions in England) , in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police. **This is a mandatory reporting duty.** See Appendix 1- Keeping Children Safe in Education (DfE 2022): Annex A for further details.

Hertfordshire Children's Services (including out of hours) 0300 123 4043.

If the allegations raised are against other children, the school should follow section 4.4 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. Please see the school's anti-bullying policy for more details on procedures to minimise the risk of child on child abuse.

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The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. (record of concern pro-forma is available on the Hertfordshire Grid for Learning).

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

If a student who is/or has been the subject of a child protection plan changes school, the DSP/DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSP/DSL at the receiving school, in a secure manner, and separate from the child's academic file.

The DSP/DSL is responsible for making the senior leadership team aware of trends in behaviour that may affect student welfare. If necessary, training will be arranged.

### 10. COMMUNICATION WITH PARENTS

WUTC will ensure the Safeguarding Policy is available publicly either via the WUTC website or by other means.

Parents should be informed prior to Child Protection Contact Referral, unless it is considered to do so might place the student at increased risk of significant harm by:

- ❖ The behavioral response it prompts e.g. a child being subjected to abuse, maltreatment or threats/ forced to remain silent if alleged abuser informed;
- ❖ Leading to an unreasonable delay;
- ❖ Leading to the risk of loss of evidential material;

(WUTC may also consider not informing parent(s) where it would place a member of staff at risk).

Ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

Where reasonably possible schools and colleges should hold more than one emergency contact number for each pupil and student.

## 11. ALLEGATIONS INVOLVING SCHOOL STAFF/SUPPLY STAFF/VOLUNTEERS/CONTRACTORS

An allegation is any information which indicates that a member of staff/supply staff/volunteer may have:

- ❖ Behaved in a way that has, or may have harmed a child
- ❖ Possibly committed a criminal offence against/related to a child
- ❖ Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children
- ❖ Behaved or may have behaved in a way that indicated they may not be suitable to work with children.

This applies to any child the member of staff/supply staff/volunteer has contact within their personal, professional or community life.

### What staff should do if they have concerns about safeguarding practices within the WUTC

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the WUTC's safeguarding arrangements.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the WUTC's senior leadership team.

If staff members have concerns about another staff member then this should be referred to the Principal. Where there are concerns about the Principal, this should be referred to the Chair of Governors.

The Chair of Governors is:

NAME: Ash Patil      [ash.patil@watfordutc.org](mailto:ash.patil@watfordutc.org)

In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair is:

NAME: Ronnie Jacob      [ronnie.jacob@watfordutc.org](mailto:ronnie.jacob@watfordutc.org)

In the event of allegations of abuse being made against the Principal, where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Local Authority Designated Officer (LADO). Staff may consider discussing any concerns with the Designated Senior Person if appropriate make any referral via them. **(See Keeping Children Safe in Education: Part Four, DfE 2022, for further information).**

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Principal.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Principal/Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer:

**Children's Services – 0300 1234043**

**SOOHS (Out of Hours Service-Children's Services) – 0300 1234043**

If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay.

If it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with section 5.15 of the Hertfordshire Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed.

The Acting Principal should, as soon as possible, **following briefing** from the Local Authority Designated Officer inform the subject of the allegation.

**For further information see:**

HSCP Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)

Section 5.15 Managing Allegations against Adults who work with Children and Young People

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- Children's Services 0300 123 4043
- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**What school or college staff should do if they have concerns about safeguarding practices within the WUTC**

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or education setting's safeguarding arrangements.
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the WUTC's senior leadership team.

### **Concerns that do not meet the harm threshold**

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

- The term 'low-level' concern is any concern – no matter how small and often if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the WUTC 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 designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns with the Acting Principal
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system



### Responding to low-level concerns

If the concern is raised via a third party, the Acting Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Acting Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the UTC's Professional Conduct Policy.

### Safer working practice

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the code of conduct and Safer Recruitment Consortium document ***Guidance for safer working practice for those working with children and young people in education settings (February 2022) and also addendum April 2020*** available at <https://www.saferrecruitmentconsortium.org/>

The document seeks to ensure that the responsibilities of school leaders towards students and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the WUTC behaviour for learning policy for more information.



## APPENDIX 1 : KEEPING CHILDREN SAFE IN EDUCATION (DfE 2022)

### Part One: Information for all staff

#### Annex B: Further Information

It is **essential** that **all** staff have access to this online document and read Part 1 and Annex A & B , which provides further information on:

- Children missing from education
- Children and the court system
- Child sexual exploitation
- Children with family members in prison
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- Child-on-child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- 'Honour based' violence
- Preventing radicalisation
- Female Genital Mutilation
- Radicalisation

This is to assist staff to understand and discharge their role and responsibilities as set out in this guidance. We highly recommend that staff are asked to sign to say they have read these sections (please see Appendix 2) and should subsequently be re-directed to these online documents again should any changes occur.

#### Link to Keeping Children Safe in Education:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/830121/Keeping\\_children\\_safe\\_in\\_education\\_060919.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830121/Keeping_children_safe_in_education_060919.pdf)

WATFORD UTC - 2021/22

**APPENDIX 2: DECLARATION FOR STAFF**

**Child Protection Policy and Keeping Children Safe in Education (DfE 2022)**

Please sign and return to Lisa Williams (DSL)

I, \_\_\_\_\_ have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these document(s).:

(1) The WUTC Safeguarding Policy

(2) **Part 1 and Annex B** of 'Keeping Children Safe in Education' DfE Guidance , 2022

I am aware that the DSPs/DSLs are:

Lisa Williams

Paul Quinn

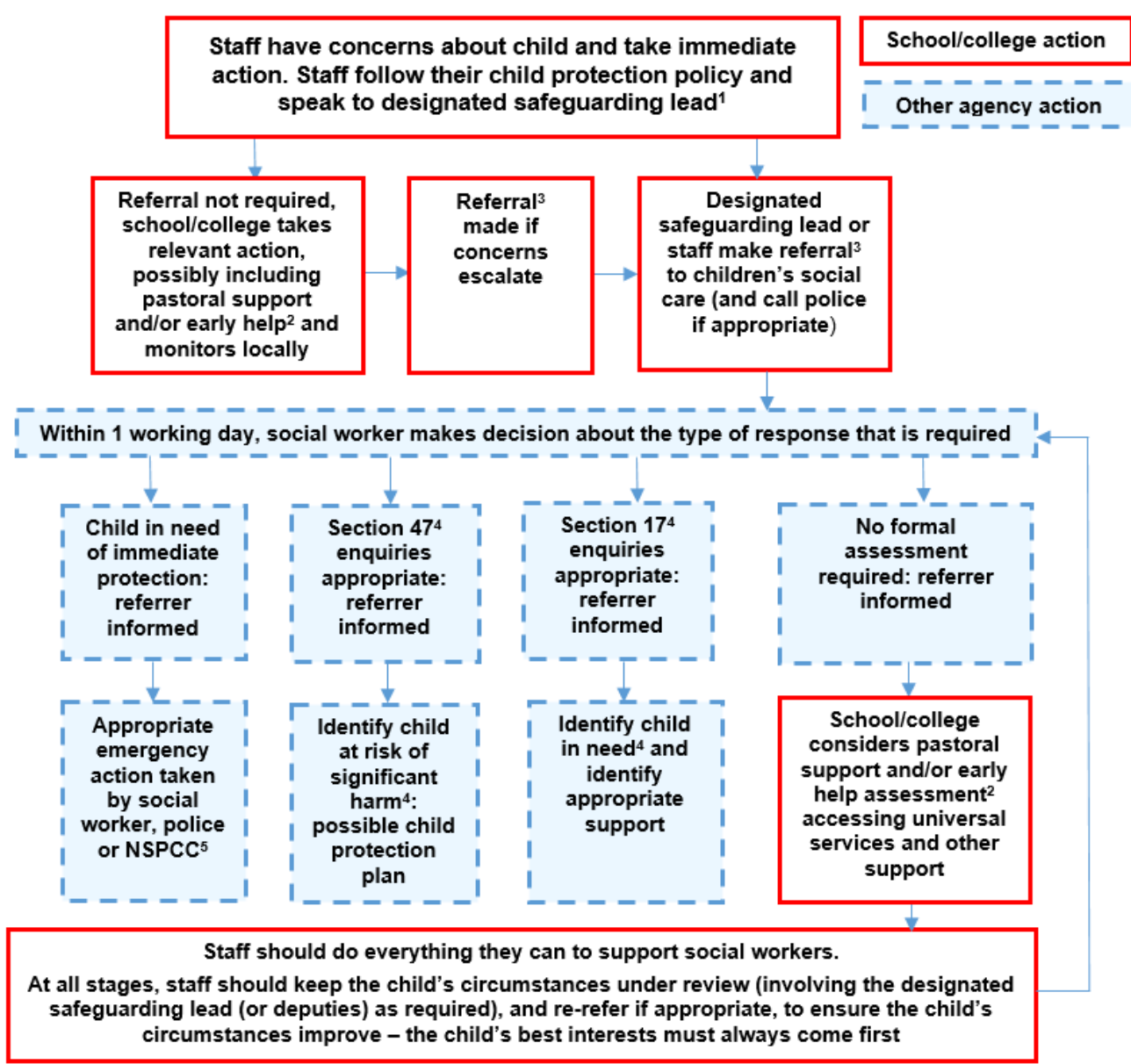
Melissa Couronne

and I am able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available on the shared network drive and **www.watfordutc.org**

Signed \_\_\_\_\_ Date \_\_\_\_\_

### APPENDIX 3: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD Flowchart



**The National Police Chiefs' Council- *When to call the police* guidance**

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at;

**<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>**

## APPENDIX 4

### OPERATION ENCOMPASS SAFEGUARDING STATEMENT

- Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.
- Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.
- Our parents are fully aware that we are an Operation Encompass school.
- The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.
- The Key Adult has also led training for all school staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.
- We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.
- The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.
- The Key Adult has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school.

#### OUR KEY ADULTS ARE:

Lisa Williams, Melissa Couronne, Paul Quinn

#### **Children missing from education in accordance with setting attendance policy**

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, child sexual exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Department for Education guidance makes it clear that in carrying out this duty, local authorities must have in place arrangements for joint working and information sharing with other local authorities and partner agencies. It also states that all agencies which come into contact with children must cooperate with the local authority's arrangements for identifying children thought to be missing from education.

Separate guidance is available for schools on Herts Grid for Learning; about the legitimate removal of pupils from a school roll. A child legitimately removed from roll is not in most cases missing from education and all schools, including academies and independent schools are legally required to notify the local authority when they remove/plan to remove a child from their roll.

## APPENDIX 5 SEXUAL VIOLENCE & SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES GUIDANCE (2021)

This is advice provided by the Department for Education (the department). Its focus is child on child sexual violence and sexual harassment at schools and colleges. The advice covers children of all ages, from primary through to secondary stage and into colleges and online. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, schools and colleges should of course protect any adult students and engage with adult social care, support services and the police as required.

The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.

The advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.

It is for individual schools and colleges to develop their own policies and procedures. It is important that policies and procedures are developed in line with their legal obligations, including the Human Rights Act 1998 and the Equality Act 2010, especially the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements. It is important that schools and colleges consider how to reflect sexual violence and sexual harassment in their whole school or college approach to safeguarding and in their child protection policy.

On publication of this Child Protection Policy, September 2021, the CPSLO Service has decided to provide the hyperlink to the document rather than the document in its entirety, due to the potential for updates to the content.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)

## APPENDIX 6

On publication of this Child Protection Policy, September 2021, the CPSLO Service has decided to signpost to the document rather than provide the document in its entirety, due to the potential for updates to the content.

**Annex D:** KCSiE (DfE,2021) for national guidance

Hertfordshire Guidance:

<https://thegrid.org.uk/safeguarding-and-child-protection/online-safety/online-safety-national-guidance>

## APPENDIX 7: INDICATORS OF ABUSE AND NEGLECT

The framework for understanding children's needs:



*Working Together to Safeguard Children (DFE, 2015)*

Physical abuse	
<i>Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.</i>	
Child	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size	Aggression towards others, emotional and behaviour problems
Burns and Scalds – shape, definition, size, depth, scars	
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injury	Fabricated or induced illness -



Parent	Family/environment
Parent with injuries	History of mental health, alcohol or drug misuse or domestic violence.
Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	

Emotional abuse	
<i>Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, not giving the child opportunities to express their views, 'making fun' of what they say or how they communicate - hearing the ill-treatment of another and serious bullying (including cyber bullying).</i>	
Child	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour
Parent	Family/environment
Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.

Neglect	
<i>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.</i>	
Child	
Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships
Parent	Family/environment
Failure to meet the child's basic essential needs including health needs	Marginalised or isolated by the community.
Leaving a child alone	History of mental health, alcohol or drug misuse or domestic violence.
Failure to provide adequate caretakers	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Keeping an unhygienic dangerous or hazardous home environment	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Unkempt presentation	Lack of opportunities for child to play and learn
Unable to meet child's emotional needs	Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
Mental health, alcohol or drug difficulties	

Sexual abuse	
<i>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 or non-contact activities, such as involving children in looking at sexual images or being groomed on line / child exploitation.</i>	
Child	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in school work habits, become truant

Sexually exploited or indiscriminate choice of sexual partners	
Parent	Family/environment
History of sexual abuse	Marginalised or isolated by the community.
Excessively interested in the child.	History of mental health, alcohol or drug misuse or domestic violence.
Parent displays inappropriate behaviour towards the child or other children	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Conviction for sexual offences	Past history in the care of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Comments made by the parent/carers about the child.	Grooming behaviour
Lack of sexual boundaries	Physical or sexual assault or a culture of physical chastisement.