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# Safeguarding & Child Protection Policy

Version 5

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## Contents

<b>1. Introduction</b>	Page 3
<b>2. Overall aims</b>	Page 4
<b>3. The categories of abuse and signs and indicators</b>	Page 4
1. Physical	Page 4
2. Emotional	Page 6
3. Sexual	Page 6
4. Neglect	Page 8
<b>4. Referrals</b>	Page 9
<b>5. Dealing with disclosures</b>	Page 10
<b>6. Recording and sharing information</b>	Page 11
<b>7. Safeguarding and child protection training for supply staff</b>	Page 12
<b>8. The role of the Designated Safeguarding Lead</b>	Page 12
<b>9. Safer recruitment</b>	Page 13
<b>10. Confidentiality</b>	Page 13
<b>11. Supporting staff</b>	Page 14
<b>12. If you have concerns about a colleague</b>	Page 14
<b>13. Peer-on-peer abuse and bullying</b>	Page 14
<b>14. The Prevent Duty</b>	Page 15
<b>15. Children or vulnerable adults with additional needs and/or disabilities</b>	Page 15
<b>16. Trafficked and exploited children</b>	Page 16
<b>17. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)</b>	Page 16
<b>18. County lines</b>	Page 18
<b>19. Serious violence</b>	Page 18
<b>20. Mental health</b>	Page 19
<b>21. Children with sexually harmful behaviour</b>	Page 19
<b>22. Forced marriage, honour abuse and killings</b>	Page 19
<b>23. Female genital mutilation</b>	Page 20
<b>24. Domestic abuse</b>	Page 20
<b>25. Private fostering</b>	Page 21
<b>26. Allegations against school staff and volunteers</b>	Page 21
<b>27. Multi-agency strategy meetings</b>	Page 22
<b>28. Incidents and allegations made against a supply worker - procedures</b>	Page 22
<b>29. Abuse of trust</b>	Page 23
<b>30. Referrals to the Disclosure and Barring Service</b>	Page 23
<b>31. COVID-19 arrangements for safeguarding</b>	Page 24

## APPENDIX 1

Record of Concern Form and Safeguarding Body Map	Page 25
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## 1. Introduction

**All children, young people and vulnerable adults have the right to be safe from harm and abuse.**

Vision for Education, ABC Teachers and Smart Teachers believe that a child, young person or vulnerable adult should never experience harm or abuse of any kind. We recognise that we have a statutory responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults and to keep them safe. At Vision for Education, ABC Teachers and Smart Teachers, we are committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and we expect everyone who works in schools or alternative learning provisions, including online tuition, to share this commitment. We take all welfare concerns seriously and believe that all children, young people and vulnerable adults have a right to be heard and to have their wishes and feelings taken into account. We will always act in the best interest of the child, young person or vulnerable adult.

**Safeguarding is defined in the Department for Education's 'Keeping Children Safe in Education' guidance as:**

- 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, and
- taking action to enable all children to have the best outcomes.

**We will fulfil local and national responsibilities as wholly as possible as a supply agency. This policy has been drawn up on the basis of law and guidance (statutory and non-statutory) that seeks to protect children, young people and vulnerable adults, namely:**

- Safeguarding Vulnerable Groups Act 2006
- Children Act 2006
- Disqualification under the Childcare Act 2018
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Human Rights Act 1998
- Sexual Offences Act 2003
- Education Act 2011
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2020, and
- SEND Code of Practice 0 to 25 years.

All staff should read and understand Part One of 'Keeping Children Safe in Education 2020'. They will be given access to a copy of the guidance as part of the registration process.

**Additional government resources that have also been taken into consideration can be found below:**

- What to do if you're worried a child is being abused (<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>).
- Information sharing (<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>).
- Mental health and behaviour in schools (<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>).

All staff are expected to maintain and update their knowledge about what constitutes abuse and to know the signs and symptoms of abuse.

We are committed to ensuring that all staff are sensitive to issues of race, culture, gender and diversity, but these issues should never be a barrier to sharing and reporting concerns about children, young person or vulnerable adult.

All staff, including permanent and temporary supply teaching, non-teaching support staff, online tutors and clerical and domestic staff, have a statutory responsibility to safeguard and promote the welfare of children, young people and vulnerable adults and must be aware of and fully conversant with this policy. All staff must have access to and observe this policy, whilst also adhering to the client school's procedures and guidance at all times. For the purposes of this document, the term 'staff' will apply to those listed above.

Because of their day-to-day contact with children, young people and vulnerable adults, staff are well placed to observe possible signs of abuse.

It is neither the role, nor responsibility, of those working with children, young people or vulnerable adults in a school, alternative provision or in an online setting, to assess, diagnose or investigate whether a child, young person or vulnerable adult is at risk of or suffering harm or abuse. It is the responsibility of all staff to be aware of the need to report any concerns to the school/setting's Designated Safeguarding Lead (DSL) as a matter of priority, or to one of the Deputy Safeguarding Leads in his/her absence.

**This policy is made available to all staff and must be read along with:**

- The Department for Education's 'Keeping Children Safe in Education (2020) (Part One), and
- Annex A - Code of Conduct.

**This policy should be used in addition to the school/setting's:**

- Behaviour Policy, and
- Safeguarding and Child Protection Policy.

## 2. Overall aims

Vision for Education, ABC Teachers and Smart Teachers believe that a child, young person or vulnerable adult should never experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and vulnerable adults and to keep them safe. We are committed to good practice which seeks to protect them.

**The purpose of this policy is to:**

- Protect children, young people and vulnerable adults who receive the services of Vision for Education, ABC Teachers or Smart Teachers.
- Provide all staff (permanent and temporary) with the overarching principles that guide our approach to child protection and the safeguarding of children, young people and vulnerable adults.
- Raise staff awareness of the need to safeguard children, young people and vulnerable adults, and their responsibilities in identifying concerns and reporting them as a matter of priority.
- Provide a framework to support staff in identifying concerns that a child, young person or vulnerable adult may be suffering harm or abuse, thereby enabling them to report those concerns without delay.
- Help staff to contribute to an environment where children, young people and vulnerable adults feel secure and are listened to and contribute to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect and shared values.
- Identify and protect the most vulnerable, identify individual needs where possible and develop plans to meet those needs.

## 3. The categories of abuse and signs and indicators

All supply staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form of maltreatment of a child, young person or vulnerable adult. Someone may abuse or neglect a child, young person or vulnerable adult by inflicting harm or by failing to act to prevent harm.

Children, young people and vulnerable adults may be abused in a family or in an institutional or community setting by those known to them, or, more rarely, by others not known to them (eg via the internet). They may be abused by an adult, adults or another child, young person or vulnerable adult.

Staff must be aware of wider safeguarding issues and that behaviours linked to drug taking, alcohol abuse, truancy and sexting, put children, young people and vulnerable adults in danger.

There are four categories of abuse. The definition of each category is set out below, with a non-exhaustive list of possible signs and symptoms.

### 1. Physical

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

**Recognising physical abuse:**

- Unexplained injuries or burns, particularly if they are recurrent.
- Refusal to discuss injuries.

- Improbable explanations for injuries or parent(s)/carer(s) undisturbed by accident/injury.
- Untreated injuries or lingering illness not attended to.
- Admission of punishment which appears excessive.
- Shrinking from physical contact.
- Fear of returning home or of parent(s)/carer(s) being contacted.
- Fear of undressing.
- Fear of medical help.
- Aggression/bullying.
- Over compliant behaviour or a 'watchful attitude'.
- Running away.
- Significant changes in behaviour without explanation.
- Deterioration in work.
- Unexplained pattern of absences which may serve to hide bruises or other physical injuries.

## **Bruising**

Children, young people and vulnerable adults can have accidental bruising. The following must be considered as indicators of harm, unless there is evidence or an adequate explanation provided. Only a paediatric view around such explanations will be sufficient to dispel concerns listed:

- Any bruising to a pre-crawling or pre-walking baby.
- Bruising in or around the mouth, particularly in small babies, which may indicate force feeding.
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, although a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on parts unlikely to be injured accidentally.
- Variation in colour, possibly indicating injuries caused at different times.
- The outline of an object used (eg belt marks, handprints or a hairbrush).
- Bruising or tears around, or behind, the earlobe(s) indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.

## **Bite marks**

Human bite marks are oval or crescent shaped. If they are over 3cm in diameter, they are more likely to be made by an adult or older child.

## **Burns and scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds - experienced medical opinion is required. Any burn with a clear outline may be suspicious eg:

- Circular burns from cigarettes (but may be friction burns along the protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of their own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds, which did not have appropriate treatment or adequate explanation.
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into hot liquid or bath.

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint, and loss of function in the limb or joint.

Non-mobile children, young people or vulnerable adults rarely sustain fractures.

### **There are grounds for concern if:**

- The history provided is vague, non-existent or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay, when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life.

## Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## 2. Emotional

Emotional abuse is the persistent emotional maltreatment of a child, young person or vulnerable adult, such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving them 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, young people or vulnerable adults. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing them frequently to feel frightened or in danger, or the exploitation or corruption of children, young people or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child, young person or vulnerable adult, though it may occur alone.

### Recognising emotional abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical

The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should therefore be aware that emotional abuse might also indicate the presence of other kinds of abuse.

#### **The following may be indicators of emotional abuse:**

- Developmental delay.
- Abnormal attachment between a child and parent (eg anxious, indiscriminate or no attachment).
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Appeasing behaviour towards others.
- Scapegoated within the family.
- Frozen watchfulness – particularly in pre-school children.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a loner – difficulty relating to others.
- Continual self-deprecation.
- Fear of new situations.
- Inappropriate emotional responses to painful situations.
- Self-harm or mutilation.
- Compulsive stealing/scrounging.
- Drug/solvent abuse.
- Neurotic behaviour – obsessive rocking, thumb sucking and so on.
- Air of detachment – don't care attitude.
- Social isolation – does not join in and has few friends.
- Desperate attention-seeking behaviour.
- Eating problems including overeating and lack of appetite.
- Depression and withdrawal.

## 3. Sexual

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are 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, young people or vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children, young people or vulnerable adults to behave in sexually inappropriate ways, or grooming a child, young person or vulnerable adult 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.

## Recognising sexual abuse

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a children, young person or vulnerable adult. Therefore, both identification and disclosure rates are deceptively low.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. According to a recent Office for National Statistics (ONS) study, three-quarters (72%) of sexually abused children did not tell anyone about the abuse at the time. Twenty-seven percent of the children told someone later, and around a third (31%) still had not told anyone about their experience(s) by early adulthood.

If a child, young person or vulnerable adult makes an allegation of sexual abuse, it is very important that they are taken seriously. Allegations can often initially be indirect as the child, young person or vulnerable adult tests the professional's response. There may be no physical signs and indications are likely to be emotional/behavioural.

### **Behavioural indicators which may help professionals identify child sexual abuse include:**

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play or conversation inappropriate to the person's age.
- Contact or non-contact sexually harmful behaviour.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including an eating disorder), self-mutilation and suicide attempts.
- Involvement in sexual exploitation or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes eg sports events (but this may be related to cultural norms or physical difficulties).

### **Physical indicators associated with child sexual abuse include:**

- Pain or itching of genital area. Scratches, abrasions or persistent infections in the anal or genital regions.
- Bruises, scratches, burns or bite marks on the body.
- Blood on underclothes.
- Pregnancy in a child, young person or vulnerable adult.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease or presence of semen on vagina, anus, external genitalia or clothing.

### **Other signs of sexual abuse:**

- Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father.
- Sexual awareness inappropriate to the person's age, for example in drawings, vocabulary, games and so on.
- Frequent public masturbation.
- Attempts to teach other children, young people and vulnerable adults about sexual activity.
- Refusing to stay with certain people or go to certain places.
- Aggressiveness, anger anxiety and tearfulness.
- Withdrawal from friends.
- Frequent vaginal infections, discharge or odours.
- Sexually transmitted diseases.

### **Possible signs of sexual abuse in older children, young people or vulnerable adults:**

- Promiscuity, prostitution and provocative sexual behaviour.
- Self-injury, self-destructive behaviour and suicide attempts.
- Eating disorders.
- Tiredness, lethargy and listlessness.
- Over-compliant behaviour.
- Sleep disturbances.
- Unexplained gifts of money.
- Depression.
- Changes in behaviour.
- Non-attendance at school.
- Talking about a new 'special' friend.

Sex offenders have no common profile, and it is important for professionals to avoid attaching any significance to stereotypes around their background or behaviour. While media interest often focuses on 'stranger danger', Ministry of Justice, Home Office and the Office for National Statistics' research indicates that as much as



80 percent of sexual offending occurs in the context of a known relationship, either family, acquaintance or colleague.

#### 4. Neglect

Neglect is the persistent failure to meet basic physical and/or psychological needs of a child, young person or vulnerable adult, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child, young person or vulnerable adult from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers), and/or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, the basic emotional needs of a child, young person or vulnerable adult.

#### Recognising neglect

It is rare that an isolated incident will lead to agencies becoming involved with a neglectful family. Evidence of neglect is built up over a period of time. Professionals should therefore compile a chronology and discuss concerns with any other agencies which may be involved with the family, to establish whether seemingly minor incidents are in fact part of a wider pattern of neglectful parenting.

**When working in areas where poverty and deprivation are commonplace, professionals may become desensitised to some of the indicators of neglect. These include:**

- Failure by parents or carers to meet essential physical needs (eg adequate or appropriate food, clothes, warmth, hygiene and medical or dental care).
- Failure by parents or carers to meet essential emotional needs (eg to feel loved and valued, and to live in a safe, predictable home environment).
- A child, young person or vulnerable adult who is seen to be listless, apathetic and unresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- A child, young person or vulnerable adult thriving away from their home environment.
- A child or young person frequently absent from school.
- A child, young person or vulnerable adult left with inappropriate carers (eg too young or complete strangers).
- A child, young person or vulnerable adult left with adults who are intoxicated or violent.
- A child, young person or vulnerable adult abandoned or left alone for excessive periods.

Disabled children, young people and vulnerable adults can be particularly vulnerable to neglect due to the increased level of care they may require.

Although neglect can be perpetrated consciously as an abusive act by a parent or carer, it is rarely an act of deliberate cruelty. Neglect is usually defined as an omission of care by the parent or carer, often due to one or more unmet needs of their own. These could include domestic abuse, mental health issues, learning disabilities, substance misuse, or social isolation/exclusion, however, this list is not exhaustive.

While offering support and services to these parents or carers, it is crucial that professionals maintain a clear focus on the needs of the child, young person or vulnerable adult.

#### Possible signs of neglect:

- Constant hunger.
- Poor personal hygiene.
- Inappropriate clothing.
- Frequent lateness or non-attendance at school.
- Untreated medical problems.
- Low self-esteem.
- Poor social relationships.
- Compulsive stealing or scrounging.
- Constant tiredness.



**Signs to watch out for:**

- Signs of low self-esteem.
- Repeated talk of failure.
- Deliberately seeking failure.
- Denial or destruction of anything good.
- Rejection of praise.
- Pleasure in criticism.
- Clowning, acting big and telling tall stories.

**Verbal signs of distress:**

- Self-denigration.
- Worthlessness.
- Pessimism.
- Hopelessness.
- Morbid thinking.
- Suicidal thoughts.
- Pathological thinking.
- Self-blame.

**Non-verbal signs of distress:**

- Loss of interest and withdrawal.
- Irritability and tearfulness.
- Tiredness and change in weight.
- Poor concentration and deterioration of work.
- Destructive behaviour\*.
- Morbid artwork and writing\*.
- Lack of self-care (deliberate)\*.
- Deliberate failure\*.
- Self-harming\*.
- Suicide attempts\*.
- Arson\*.

\* Particularly significant and should never be ignored.

## 4. Referrals

If you have a concern that a child, young person or vulnerable adult is being abused or is at risk of being abused, it will be taken seriously. It is vitally important that you share the information with the school/setting's Designated Safeguarding Lead (DSL) immediately. Information regarding the specific setting's DSL should be issued to staff by the school/setting at the start of the booking.

Staff should record the information and include the date you received information or had concerns, the nature of the concern including any physical marks seen or anything that the child, young person, vulnerable adult or someone else has told you. You can use the school/provision's concern tracking sheet or, where this is not possible, the agency's 'Record of Concern Form' (Appendix 1). If you cannot find one of the school/provision's DSLs, please contact one of the agency DSL as soon as possible using the contact details listed in this policy.

Where online tutors have a safeguarding concern about a child, young person or vulnerable adult, they should raise the issue by informing the school/setting's DSL. If contact with the DSL or deputy DSL of the school// setting cannot be made, then inform the agency's DSL. The agency's DSL contact information is listed in this policy and is also available within the online tutoring platform.

In all cases, the reporting of concerns in the contexts listed above should go directly to the school/provision's DSL. Where it is possible to make this contact in the first instance, please also copy in the supply DSL as listed in this document, so the agency has an overview of any issues raised.

Any child, young person or vulnerable adult in any family or any school could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'.

Anyone can make a referral if they are concerned a child, young person or vulnerable adult is in immediate danger. They must inform the DSL (as above) that a referral has been made as soon as possible.

**Circumstances where any member of staff can make a referral to the local authority's social care team are as below:**

- The situation is an emergency and the school/provision's DSL, their deputy DSL, the Headteacher and the Chair of Governors are all unavailable.
- They are convinced that a direct report is the only way to ensure a child, young person or vulnerable adult's safety.
- If, for any other reason, they make a judgement that a direct referral is in the best interests of the child, young person or vulnerable adult.

Please note that due to the nature of our supply business, staff are placed in numerous settings in different geographical areas. Due to this, there are several local authorities that we provide supply staff to. With this in mind, for an emergency referral, supply staff will need to seek out the relevant contact details for the local authority pertaining to their placement.

- In an emergency, take the action necessary to help the child, young person or vulnerable adult (for example call 999).
- Report your concern to the DSL immediately.
- Do not start your own investigation.
- Share information on a need to know basis only – do not discuss with colleagues, friends or family.
- Complete our 'Record of Concern Form' (Appendix 1).
- Seek support for yourself if you are distressed, finding it difficult to cope or would like to talk through any issues.

## **5. Dealing with disclosures**

### **Receive:**

- Listen to what is being said without displaying shock or disbelief.
- Accept what is said.
- Make a note of what has been said as soon as practicable.

### **Reassure:**

- Reassure the child, young person or vulnerable adult, but only so far as is honest and reliable. For example, don't make promises you may not be able to keep, such as. 'I'll stay with you' or 'everything will be alright now'.
- Do reassure and alleviate guilt if the child, young person or vulnerable adult refers to it. For example:
  - I believe you.
  - I am glad you came to me.
  - I am sorry this has happened.
  - You're not to blame. You are not alone. You are not the only one this sort of thing has happened to.
  - We are going to do something together to get help.
- Do not promise to keep it a secret as your professional responsibilities may require you to report the matter. If you make this promise to a child, young person or vulnerable adult and then break it, you confirm to them yet again that adults are not to be trusted.

### **React:**

- React to the child, young person or vulnerable adult only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask leading questions, for example 'what did they do next?'. Such questions may invalidate your evidence (and theirs) in any later prosecution in court.
- Do not criticise the alleged perpetrator as the child, young person or vulnerable adult may care about him/her and reconciliation may be possible.
- Do not ask the child, young person or vulnerable adult to repeat what they have disclosed for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the child, young person or vulnerable adult that it will be a senior member of staff - the DSL.
- At the point of disclosure, try to see the matter through yourself and keep in contact with the child, young person or vulnerable adult. During day-to-day or short-term placements, ensure you reassure the child, young person or vulnerable adult that the DSL will keep in contact with them as it would not be possible for you to do so.

## Record:

- Make some very brief notes at the time of disclosure and write them up as soon as possible.
- Do not destroy your original notes in case they are required at a later date.
- Record the date, time, place, persons present, any noticeable non-verbal behaviour and the words used by the child, young person or vulnerable adult. If they use pet words, abbreviations or colloquialisms, record the actual words used rather than translating them into proper words. Use the school/provision's concern tracking sheet or, where this is not possible, the agency's 'Record of Concern Form' (Appendix 1).
- Draw a diagram or complete our 'Safeguarding Body Map' document to indicate the position of any injuries.
- Record statements and observable things rather than your interpretations or assumptions.

## Remember:

- Follow the school/provision's Child Protection Policy and Procedures and share your concerns with their DSL.
- Refer to the local authority's social care services and/or the police if relevant.
- Support the child, young person or vulnerable adult - listen, comfort and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Try to get some support for yourself if you need it.

## 6. Recording and sharing information

Staff recognise the importance of sharing information with other agencies. Further information on sharing information can be found in the government's 'Working Together to Safeguard Children 2018' and 'Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers' documents. Staff also recognise that the Data Protection Act 2018 and General Data Protection Regulation (GDPR) do not prevent the sharing of information for the purposes of keeping children, young people and vulnerable adults safe. This includes allowing practitioners to share information without consent.

Recording is a tool of professional accountability and is central to safeguarding and protecting children, young people and vulnerable adults. We keep a central record of staff safeguarding and child protection training.

It is vital that concerns are recorded comprehensively and accurately, so that they can be monitored and emerging patterns noticed. All verbal conversations must be promptly recorded in writing.

### Reporting concerns

Concerns about children, young people or vulnerable adults should be recorded on the school/setting's concern tracking sheet or, where this is not possible, the agency's 'Record of Concern Form' (Appendix 1), which will detail the concerns about the child, young person or vulnerable adult and discussion with the DSL or deputy DSL. Please see the 'Record of Concern Form'.

All advice and agreed actions should be dated and signed and a record made of whom the concern has been shared with.

Copies of the school/setting's concern tracking sheet or the 'Record of Concern Form' should be shared **immediately** with the DSL or deputy DSL of the client school or alternative provision. In the circumstance that contact with the DSL or deputy DSL of the setting cannot be made, the school/setting's concern tracking sheet or the 'Record of Concern Form' should then be shared with an agency's DSL without delay.

For online tutors who do not have access to the corresponding school/setting's DSL or deputy DSL's contact details, or where contact cannot be made, they should then contact an agency DSL or deputy DSL using the contact information which is listed in this policy, and is also available within the online tutoring platform, without delay.

For online tutors, our 'Record of Concern Form and 'Safeguarding Body Map' can be found within the online platform.

Supply staff are expected to find out where to locate the school/provision's reporting resources at the beginning of their placement.

Internal sharing of information will be limited to sharing information with staff where it will evidently benefit a child, young person or vulnerable adult and will generally be on a need to know basis. Information sharing and contact (or attempted contact) with other agencies should be logged.

It is expected that all staff are aware of the importance of sharing information and working with other professionals to get a full picture of need, so that the right help can be given to a child, young person or

vulnerable adult. It is also expected that everyone who works with children, young people and vulnerable adults has a role to play in identifying concerns, sharing information and taking prompt action.

## 7. Safeguarding and child protection training for supply staff

In line with the Department for Education's Keeping Children Safe in Education guidance, the agencies require all supply staff to have read and understood Part 1 and Annex A of the Department for Education's Keeping Children Safe in Education guidance, and this is confirmed via a candidate declaration prior to clearing. Annual updates to the Keeping Children Safe in Education guidance are communicated to all active staff via email.

Candidates in the process of registering with the agencies are asked if they have completed safeguarding and child protection training within the last 12 months. If they have not, at interview we provide them with access to complete a short online training course during their registration.

The agencies will issue supply staff with a termly safeguarding and child protection briefing via email. Staff are expected to read these briefings to ensure they are familiar with topical issues, up to date policies, and that they have access to a free safeguarding and child protection course via EduCompli, accessible via an app on their phone or by using a web browser. Completion of this course is not mandated but is available should they wish to.

Candidates who have been subject to incidents or allegations during a placement with our agencies may be required to complete further training if it is appropriate to consider them for future work.

## 8. The role of the Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is a senior member of staff who takes the lead responsibility for child protection and has the status and authority within the agency to carry out the duties of the post including committing resources and where appropriate supporting and directing other staff.

**DSL: Fiona Baker** T 07713 323 814 E [fiona.baker@visionforeducation.co.uk](mailto:fiona.baker@visionforeducation.co.uk)

**Deputy DSL: Jo Betteley** T 07860 931 009 E [jbetteley@abc-teachers.co.uk](mailto:jbetteley@abc-teachers.co.uk)

**Deputy DSL: Becky Haddi** T 07501 465 612 E [becky.haddi@visionforeducation.co.uk](mailto:becky.haddi@visionforeducation.co.uk)

**Deputy DSL: Amber Hawkeswood** T 07522 346 986 E [amber.hawkeswood@visionforeducation.co.uk](mailto:amber.hawkeswood@visionforeducation.co.uk)

The DSL is supported by deputies who are trained to the same standard as the DSL. Ultimate lead responsibility for safeguarding and child protection remains with the DSL, whose responsibility cannot be delegated.

The agency DSL and deputy DSLs will complete Advanced Safeguarding for DSLs training every two years.

Additionally, they will complete the following online training at least annually:

- Child Protection in Education Level 2
- Safer Recruitment in Education Level 2, and
- Safeguarding Young People Level 2.

In addition to their formal training, their knowledge and skills are updated, eg via e-bulletins, meeting other DSLs and taking time to read and digest safeguarding developments at regular intervals, to keep up with any developments relevant to their role. Updates are provided via the Department for Education and external specialist safeguarding consultants.

In the context of a supply agency, it should be noted that the DSL and deputy DSLs do not have any direct contact with children, young people or vulnerable adults. The agency's DSLs will work in conjunction with client school/provision's DSLs as wholly as possible.

The broad areas of responsibility for the DSL and DDSLs are to work with external agencies and professionals on matters of safety and safeguarding.

### Managing referrals

Managing referrals from supply staff or any others from outside the agency, including:

- Referring all cases of suspected abuse to social care services.
- Referring to the Local Authority Designated Officer (LADO) where there are allegations against staff.
- Disclosure and Barring Service (in cases where a person is dismissed or left due to risk/harm to a child, young person or vulnerable adult).
- Referring to the police (in cases where a crime may have been committed).
- Liaising with the Headteacher to inform him or her of issues, especially ongoing enquiries, under section 47 of the Children Act 1989 and police investigations.

- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## Training

The DSL and deputy DSLs should receive appropriate training every two years (at a minimum) in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference, a child protection review conference and be able to attend and contribute to these effectively when required.
- Ensure each member of staff has access to and understands the agency's Safeguarding and Child Protection Policy and Procedures.

In addition to all staff being required to attend safeguarding and child protection training, staff will also receive updates by email, staff meetings or e-bulletins, to keep their skills and knowledge up-to-date. This will take place at least annually.

## 9. Safer recruitment

Safe recruitment and selection practice is vital in safeguarding and protecting children, young people and vulnerable adults. We recognise and take seriously our responsibility to adopt practices which minimise risk by ensuring that measures are in place to deter, reject or identify people who might abuse children, young people or vulnerable adults, or who are unsuitable to work with them.

The safety and wellbeing of children, young people and vulnerable adults is considered at all times throughout the recruitment and selection process. We follow guidance that is contained in the Department for Education's 'Keeping Children Safe in Education 2020', along with our own Safer Recruitment Policy. This includes guidance on the disqualification declaration requirement for the staff to which it is applicable.

In accordance with this, we make sure that appropriate checks are carried out on new and existing staff, and bear in mind the safety of children, young people and vulnerable adults when advertising posts, calling for and scrutinising references and clarifying gaps in employment history, through to the interview process and carrying out enhanced Disclosure and Barring Service (DBS) and professional checks and verifications of qualifications and identity. As part of our induction, all branch staff who are involved in the candidate recruitment process receive safer recruitment training, which has to be updated every two years.

### All staff will be issued with:

- Our 'Code of Conduct', which includes acceptable use policy, staff/pupil relationships and communications, including the use of social media, and other related matters.
- Safeguarding and Child Protection Policy.
- Part 1 of the Department for Education's 'Keeping Children Safe in Education 2020' guidance.
- Information regarding the role of the DSL.

In addition to obtaining a Disclosure and Barring Service certificate, anyone appointed to carry out teaching work has an additional check to ensure they are not prohibited from teaching. A person who is prohibited from teaching will not be appointed to our supply register.

For those engaged in management roles, an additional check will be carried out to ensure they are not prohibited under Section 128 provisions.

## 10. Confidentiality

All staff will understand that safeguarding and child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

All matters relating to safeguarding and child protection are strictly confidential. Child and adult protection information regarding children, young people and vulnerable adults will be shared with staff on a strictly need to know basis. A member of staff will need to know information when it can be evidenced to benefit the child, young person nor vulnerable adult. All staff are expected to conform to our standards of good professional practice and maintain confidentiality appropriately at all times.

All staff must be aware of their responsibility to share information with the DSL and other agencies in order to protect and safeguard children, young people and vulnerable adults. However, following a number of cases where senior leaders have failed to act upon concerns raised by staff, 'Keeping Children Safe in Education 2020'



emphasises that any member of staff can contact social care services if they are concerned about a child, young person or vulnerable adult.

Record of concern forms and other written information will be stored securely and password protected, and only made available to relevant individuals. Every effort will be made to prevent unauthorised access.

The Data Protection Act 2018 does not prevent school staff from sharing information with relevant agencies where that information may help to protect a child, young person or vulnerable adult.

No one in the school/provision may guarantee to a child, young person or vulnerable adult that they will keep a secret and must always make it clear, in language that is appropriate to the age and understanding of the child, young person or vulnerable adult, that any information which leads an adult to be concerned that a child, young person or vulnerable adult is suffering or is at risk of suffering harm will be shared with the school/setting's DSL in order to take measures to safeguard the child, young person, vulnerable adult or others at risk.

## **11. Supporting staff**

We recognise that child and adult protection is a difficult and sometimes upsetting subject for those who work with children, young people or vulnerable adults. Working with a child, young person or vulnerable adult who has suffered harm, or is at risk of harm, may be stressful and distressing. We are committed to supporting staff by encouraging them to talk through their experiences and anxieties with the school/setting's DSL or deputy DSL, and to seek further support from the agency or their GP as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will be addressed sensitively and effectively in accordance with agreed whistleblowing procedures.

We believe that working within a school/setting that has clear child protection policies and procedures also helps to support staff in carrying out their duties and responsibilities effectively.

Where there are concerns about the way that safeguarding is carried out within a school/setting that a worker has been assigned to, then the school/setting's own Whistleblowing Policy should be referred to.

Where there are concerns relating to misconduct or wrongdoing by the agency, then refer to the agency's Whistleblowing Policy, which is available on the agency's website.

## **12. If you have concerns about a colleague**

If staff have safeguarding concerns, or an allegation is made about another member of staff (including governors, supply teachers, agency staff and volunteers), posing a risk of harm to children young people of vulnerable adults, then:

- This should be referred to the Headteacher.
- Where there are concerns or allegations about the Headteacher, this should be referred to the Chair of Governors, Chair of the Management Committee or Proprietor of an independent school.
- In the event of concerns or allegations about the Headteacher, where the Headteacher is also the sole Proprietor of an independent school, this should be reported directly to the LADO at the local authority.

## **13. Peer-on-peer abuse and bullying**

Children, young people and vulnerable adults can abuse other children, young people and vulnerable adults, and all staff should be aware safeguarding issues can manifest themselves via peer-on-peer abuse.

This is most likely to include, but not limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing
- physical harm
- sexual violence and sexual harassment
- gender-based violence
- sexting (also known as youth produced sexual imagery), and
- initiation-type violence and rituals.

All peer-on-peer abuse is unacceptable. Abuse is abuse and should never be tolerated or passed off as banter or part of growing up. Different gender issues can be prevalent when dealing with peer-on-peer abuse. This could for example include girls being sexually touched or assaulted or boys being subject to initiation-type violence.

We believe that all children, young people and vulnerable adults have a right to attend school and learn in a safe environment. Children, young people and vulnerable adults should be free from harm by adults in the school/



alternative provision and other students.

While bullying between children, young people and vulnerable adults is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child, young person or vulnerable adult's wellbeing and, in very rare cases, has been a feature in the suicide of some young people and vulnerable adults.

All incidences of bullying, including cyber-bullying and prejudice-based bullying, should be reported.

All staff who work directly with children and young people must read the Department for Education's 'Keeping Children Safe in Education 2020', which contains additional information about specific forms of abuse.

If you are not already familiar with the Department for Education's 'Sexual violence and sexual harassment between children in schools and colleges' guidance, we would ask you to read it and understand how you can prevent and should respond to reports of sexual violence and harassment between children.

Staff who receive a report of sexual assault or sexual harassment must report this to the school/setting's DSL or deputy DSL without delay. The school must follow their procedures for responding to and managing reports of sexual assault and sexual harassment in accordance with Part 5 of Keeping Children Safe in Education.

## 14. The Prevent Duty

As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism. This has become known as the Prevent Duty. We will support schools in this duty as wholly as possible.

Where staff are concerned that children, young people or vulnerable adults are developing extremist views or show signs of becoming radicalised, they should discuss this with the school/setting's DSL.

They will have received training about the Prevent Duty and tackling extremism, and will be able to support staff with any concerns they may have. Staff should be alert to changes in children, young people and vulnerable adult's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children, young people and vulnerable adults who might be at risk of radicalisation and act proportionately, which may include the school/setting's DSL or deputy DSL making a Prevent Referral.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people and vulnerable adults do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

### **Recognising early indicators of radicalisation or extremism may include:**

- Showing sympathy for extremist causes.
- Glorifying violence, especially to other faiths or cultures.
- Making remarks or comments about being at extremist events or rallies outside school.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations or other extremist groups.
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people and vulnerable adults can come across online, so involvement with particular groups may not be apparent).
- Secretive behaviour.
- Online searches or sharing extremist messages or social profiles.
- Intolerance of difference including faith, culture, gender, race or sexuality.
- Graffiti, artwork or writing that displays extremist themes.
- Attempts to impose extremist views or practices on others.
- Verbalising anti-western or anti-British views.
- Advocating violence towards others.

## 15. Children or vulnerable adults with additional needs and/or disabilities

We recognise that children, young people or vulnerable adults with special educational needs or disabilities are more vulnerable to abuse. The risks to children, young people or vulnerable adults with additional needs and/or disabilities may be increased by their need for practical assistance and physical dependency, including intimate care, which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated.

### **Additional barriers can exist when recognising abuse and neglect in this group. This can include:**

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child, young person or vulnerable adult's disability without further exploration.
- Children, young people or vulnerable adults with special educational needs and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Further information on safeguarding disabled children and young people is available in the government's document 'Safeguarding Disabled Children - Practice Guidance'.

Staff working with children, young people or vulnerable adults in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern. Staff should have a detailed knowledge of student's individual care needs (as well as their academic needs) and take these into account when working with them and their families. Concerns should be shared immediately with the school/setting's DSL or deputy DSL.

All staff working with children, young people or vulnerable adults with special educational needs or disabilities will receive appropriate training to enable them to meet the needs of these children, young people and vulnerable adults appropriately and to recognise and report any concerns.

**When working with children, young people or vulnerable adults with disabilities, staff must be aware that additional possible indicators of abuse and/or neglect may also include:**

- A bruise that might not be of concern on an ambulant child, young person or vulnerable adult such as the shin, might be of concern on a non-mobile child, young person or vulnerable adult.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling and extreme behaviour modification such as deprivation of medication, food or clothing.
- Unwillingness to try to learn a child, young person or vulnerable adult's means of communication.
- Ill-fitting equipment, for example callipers, sleep boards and inappropriate splinting.
- Misappropriation of a child, young person or vulnerable adult's finances.
- Inappropriate invasive procedures.

## 16. Trafficked and exploited children

A trafficked child or young person is coerced or deceived by the adult who brings them into the country. Trafficked children and young people are denied their human rights and are forced into exploitation eg domestic servitude, forced marriage, criminal activity, begging, benefit fraud, acting as a drug mule, sweatshop or restaurant work. Children and young people may appear to submit willingly through fear for themselves or their family, because their parents have agreed to the situation or because of bribes.

Recognition of trafficked and exploited children and young people will normally rely on a combination of general signs of abuse and/or neglect and issues concerned with the child or young person's immigration status. These children and young people may not be in possession of their own travel documents, be excessively afraid of being deported, be in possession of false papers, being cared for by an adult who is not their parent and/or presenting with a history of missing links and unexplained moves. Supply staff should report concerns to the school/setting's DSL or deputy DSL, so that a referral can be made.

**For more guidance, please see the Government's guidance on safeguarding children and young people who may have been trafficked** (<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>).

## 17. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

**Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person into any criminal activity:**

- a) in exchange for something the victim needs or wants
- b) for the financial or other advantage of the perpetrator or facilitator, and/or
- c) through violence or the threat of violence.

The victim may have been criminally exploited, even if the activity appears consensual. CCE does not always involve physical contact, it can also occur through the use of technology. CCE can include children and young people being forced to work in cannabis factories, being coerced into moving drugs or money across the

country (county lines), forced to shoplift or pickpocket, or to threaten other children or young people.

**Some of the following can be indicators of CCE. Children or young people who:**

- Appear with unexplained gifts or new possessions.
- Associate with other children or young people involved in exploitation.
- Suffer from changes in emotional wellbeing.
- Misuse drugs and alcohol.
- Go missing for periods of time or regularly come home late.
- Regularly miss school or education or do not take part in education.

**The above CCE indicators can also be indicators of Child Sexual Exploitation (CSE), as can children or young people who:**

- Have older boyfriends or girlfriends.
- Suffer from sexually transmitted infections or become pregnant.

**The key indicators of CSE can include:**

- Acquisition of money, clothes and mobile phones etc. without plausible explanation.
- Gang-association and/or isolation from peer or social networks.
- Exclusion or unexplained absences from school, college or work.
- Leaving home or care without explanation and persistently going missing or returning late.
- Excessive receipt of texts or phone calls.
- Returning home under the influence of drugs or alcohol.
- Inappropriate sexualised behaviour for age or sexually transmitted infections.
- Evidence of or suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours.
- Self-harm or significant changes in emotional wellbeing.

**CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity:**

- a) in exchange for something the victim needs or wants, and/or
- b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact - it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity, and may occur without the child or young person's immediate knowledge (eg through others copying videos or images they have created and posted on social media).

Staff should be aware that victims of CSE often do not recognise themselves as such.

**Although the following vulnerabilities increase the risk of CSE, it must be remembered that not all children and young people with these indicators will be exploited. CSE can occur without any of these issues:**

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

Further information on CSE can be found in the government's 'Child Sexual Exploitation: Definition and a Guide for Practitioners (DfE 2017)' (<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>).

As trafficking is closely related to CSE, there is also further guidance in the government's 'Safeguarding Children and Young People from Sexual Exploitation' (<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-from-sexual-exploitation-supplementary-guidance>).

Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

If staff suspect a child or young person has been sexually exploited or is at risk of sexual exploitation, they must share the information with the school/setting's DSL, deputy DSL or Headteacher without delay.

The Department for Education's guidance on 'What to do if you think a child is being sexually exploited' can be found on the .Gov website (<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>).

## 18. County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of deal line.

Exploitation is an integral part of the county lines offending model, with children, young people and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children, young people and vulnerable adults can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children, young people and vulnerable adults are often recruited to move drugs and money between locations and are known to be exposed to techniques such as plugging, where drugs are concealed internally to avoid detection.

Children, young people and vulnerable adults can easily become trapped by this type of exploitation, as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered.

If a child, young person and vulnerable adult is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered, alongside consideration of availability of local services or third sector providers, who can offer support to victims of county lines exploitation.

Further information regarding county lines can be found in Home Office 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' guidance (<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>).

## 19. Serious violence

All staff should be aware of indicators which may signal that children, young people or vulnerable adults are at risk from, or are involved with, serious violent crime. **These following indicators could suggest that a child, young person or vulnerable adult has been approached by, or are involved with, individuals associated with criminal networks or gangs:**

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm
- a significant change in wellbeing
- signs of assault or unexplained injuries, and or
- unexplained gifts or new possessions.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice

for schools and colleges is provided in the Home Office's 'Preventing Youth Violence and Gang Involvement' guidance (<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>).

## 20. Mental health

All agency staff are aware that mental health problems can, in some cases, be an indicator that a child, young person or vulnerable adult has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Agency staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child, young person or vulnerable adult that may also be a safeguarding concern, they should raise the issue by informing the school/setting's DSL or deputy DSL. Information regarding the specific school/setting's DSL should be issued to staff by each school/setting at the start of the booking. For online tutors who do not have access to the corresponding school/setting's DSL or deputy DSL's contact details, or where contact cannot be made, they should then contact an agency DSL or deputy DSL using the contact information which is listed in this policy, and is also available within the online tutoring platform, without delay.

## 21. Children with sexually harmful behaviour

Children and young people may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school/provision's anti-bullying procedures where necessary. However, there will be occasions when a child or young person's behaviour warrants a response under child protection rather than anti-bullying procedures. ONS research indicates that up to 30% of child sexual abuse is committed by someone under the age of 16.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Children and young people who display such behaviour may be victims of abuse themselves, and child protection procedures will be followed for both the victim and perpetrator. Staff who become concerned about a pupil's sexualised behaviour should speak to the school/provision's DSL or deputy DSL as soon as possible.

## 22. Forced marriage, honour abuse and killings

So-called honour-based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community including female genital mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

**It is an offence to force someone to marry against their will - Section 74 of the Serious Crime Act 2015. This includes:**

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).
- Breaching a Forced Marriage Protection Order is also a criminal offence.
- The civil remedy of obtaining a Forced Marriage Protection Order through the family courts will continue to exist alongside the new criminal offence, so victims can choose how they wish to be assisted.

Guidance on dealing with concerns regarding forced marriage is contained in the government's 'Handling Cases of Forced Marriage: Multi-Agency Practice Guidelines' (<https://www.gov.uk/government/publications/handling-cases-of-forced-marriage-multi-agency-practice-guidelines-english>).

A forced marriage is distinct from a consensual, arranged marriage because it is without the valid consent of both parties and duress is a factor. A child or young person who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse.

Information about a forced marriage may come from the child or young person themselves, the child or young person's peer group, a relative or member of the child or young person's local community or from another professional. Forced marriage may also become apparent when other family issues are addressed, eg domestic abuse, self-harm, child abuse or neglect, family/young person conflict, a child absent from school or a missing child/runaway.

Forced marriage may involve the child or young person being taken out of the country for the ceremony, is likely to involve non-consensual/under-age sex and refusal to go through with a forced marriage has often been linked to honour killing or violence.



Where staff are concerned that a child or young person might be at risk of HBA or forced marriage, they must contact the school/setting's DSL or deputy DSL as a matter of urgency.

It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the child or young person and bring forward both the travel arrangements and marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the child or young person and family.

### 23. Female genital mutilation

It is illegal in the UK to subject a child or young person to female genital mutilation (FGM) or to take a child or young person abroad to undergo the procedure – Female Genital Mutilation Act 2003.

Despite the harm it causes, FGM practising communities consider it normal to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood.

#### **Staff should be alert to the following indicators:**

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the toilet due to difficulties urinating.
- Long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college.
- Prolonged absence from school or college with noticeable behaviour changes (eg withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- Reluctantly to undergo normal medical examinations.
- Anxious, depressed and emotionally withdrawn.
- Sudden decline in performance, aspirations or motivation

#### **A girl may:**

- Confide in a professional.
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.
- Talk about pain or discomfort between her legs.

Where staff are concerned that a child or young person might be at risk of FGM, they must contact the school/setting's DSL or deputy DSL as a matter of urgency. Any information or concern that a child or young person is at immediate risk of, or has undergone, FGM will result in a child protection referral. Staff should be alert to the need to act quickly and not to mediate with or alert parents to professionals' concerns.

Staff have a legal duty which requires them to report known cases of FGM in under 18s, which they identify in the course of their work, to the police.

FGM is a form of child abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual leaves victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anesthetic, it involves the partial or total removal of the external female genital organs.

Talking about FGM can be difficult and upsetting. Staff may wish to speak with their DSL if they are affected by what they have heard.

### 24. Domestic abuse

The Home Office's definition of Domestic Abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. **The abuse can encompass, but is not limited to:**

- psychological
- physical
- sexual
- financial, and
- emotional.

All children, young people and vulnerable adults can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.



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

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This definition, which is not a legal definition, includes so called honour based abuse, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

The harm caused to children, young people and vulnerable adults can be significant – through emotional and physical abuse and/or neglect. From 2002, the definition of significant harm was amended to include “the harm that children suffer by seeing or hearing the ill-treatment of another, particularly in the home”.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school/setting and/or can occur between children, young people and vulnerable adults outside of these environments. All staff, but especially the DSL and deputy DSL, should consider whether children, young people or vulnerable adults are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children, young people and vulnerable adults can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

If staff are aware that a child, young person or vulnerable adult is witnessing or hearing domestic abuse, they should inform the school/setting's DSL or deputy DSL, who should in turn refer the matter.

## 25. Private fostering

Whilst most privately fostered children and young people are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child or young person has come from another country. In some cases, privately fostered children and young people are affected by abuse and neglect, or can be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools and settings have a mandatory duty to report to the local authority where they are aware or suspect that a child or young person is subject to a private fostering arrangement.

In order to fully support this, supply staff should notify the school/setting's DSL or deputy DSL when they become aware of private fostering arrangements.

The DSL will speak to the family of the child or young person involved to check that they are aware of their duty to inform the local authority (LA). The school itself has a duty to inform the LA of the private fostering arrangements.

## 26. Allegations against school staff and volunteers

Staff are aware of the process to handle allegations against staff, including the Headteacher. Part 4 of the Department for Education's 'Keeping Children Safe in Education 2020', sets out the process that must be followed.

**School/setting Headteachers and Chair of Governors have a duty to report to the LADO (within 24 hours) if anyone working in a school, college or alternative provision that provides education for children under 18 years of age, including supply teachers and volunteers, has:**

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

Allegations against staff should be reported to the Headteacher. Allegations against the Headteacher should be reported to the Chair of Governors. Staff may also report their concerns directly to the police or the local authority's social care team if they believe direct reporting is necessary to secure action.

Staff are reminded that publication of material that may lead to the identification of a teacher who is the subject

of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

#### **The Headteacher/Chair of Governors will establish and share with the LADO:**

- That an allegation has been made.
- The general nature of the allegation eg whether child or young person sustained injury/mark.
- When and where the alleged incident occurred.
- Who was involved and whether any other persons were present.
- What the view of the parents/carers is.
- Background information on the member of staff and the child/children or young person/young people.

The information will be shared with local authority's Children's Social Care team, who will liaise with the Police Child Abuse Investigation Team in relevant cases, and a decision will be made as to whether a strategy meeting will take place. The Headteacher or DSL, and in some cases the agency, will attend the strategy meeting.

#### **National Tutoring Programme (NTP)**

All safeguarding allegations and incidents related to the NTP should be reported to the Education Endowment Foundation (EEF) as soon as we become aware of the allegation or incident, and the NTP Safeguarding Reporting Requirements Procedure should be followed.

### **27. Multi-agency strategy meetings**

This meeting will be chaired by the LADO or a senior member of the local authority's Children's Social Care team, and will also be attended by a representative from Human Resources, a social worker and the Headteacher/Chair of Governors. The Police Child Abuse Investigation Team will be consulted and may attend if they consider a crime may have been committed.

#### **The purpose of the meeting is to share information and the discussion will include the following:**

- Whether the allegation triggers a S47 investigation by the police and/or Children's Social Care.
- What plans need to be made to safeguard the child or young person.
- Whether the child or young person is in need of services.
- Whether the school should conduct its own disciplinary investigation.
- What support can be offered to the member of school staff against whom the allegation is made.
- Whether a suspension is appropriate.
- Whether a referral needs to be made to the Disclosure and Barring Service that a person may be unsuitable to work with children and young people.

#### **At the strategy meeting, a decision will be made as to whether the allegation is:**

- **Substantiated** – Actions to be agreed on next course of action eg S47 investigation, police investigation and/or referral to the DBS. Any referral to the Crown Prosecution Service must be reviewed after 4 weeks. Referral to DBS must be made within one month of a subject leaving
- **Unsubstantiated** – Not enough evidence to support the allegation.
- **Malicious** – Referral to Children's Social Care as child or young person in need.
- **False** – There is sufficient evidence to disprove the allegation.

The subject of the allegation will usually be dealt with internally by the school through the school investigation process. The agency will be provided with an outcome of the investigation. If formal disciplinary action is required, it will be implemented by the agency. Only substantiated allegations will be referred in references.

### **28. Incidents and allegations made against a supply worker - procedures**

The aim of this procedure is to set out the actions to be taken when these rules are breached and to ensure consistent and fair treatment for all.

This procedure is designed to establish the facts quickly and deal with safeguarding matters consistently. No action will be taken until the case has been fully investigated.

This procedure may be implemented at any stage if the supply worker's alleged misconduct warrants such action. This procedure applies to all supply workers regardless of length of service.

Whilst working for the company, should an incident or allegation be made against a supply worker, the following procedures will be followed:

- **If a school or alternative provision informs us of a particular incident, but they do not wish to take the matter further**, a Safeguarding Manager will call you to arrange a meeting to discuss the incident or

allegation. The supply worker will not be offered any further work until after the meeting and will not be paid by the company during this time. During the meeting, the supply worker will have the opportunity to discuss the incident and put forward their version of events. After the meeting, a decision will be made regarding whether the supply worker can continue to work for the company. Where it is decided that further work will be offered, it is expected that additional training will be completed before recommencing work, including child protection, safeguarding and GDPR training and, if appropriate, a Team Teach course.

- **If a school or alternative provision informs us of a particular incident or allegation, and they are taking the matter further**, the school or alternative provision will inform the Local Authority Designated Officer (LADO) and the school will investigate the incident or allegation. If the incident or allegation reaches the LADO threshold, a position of trust meeting will be organised, where representatives from the company, the school or alternative provision and, in some instances, the police and social workers meet with the LADO to discuss the incident or allegation. This process can be lengthy, and the supply worker will not be allowed to work with children, young people or vulnerable adults in any capacity during this time. The supply worker will not be paid by the company during this process. Our decision regarding whether to work with the supply worker again will be based on the outcome of this process. Outcomes will be one of the following:
  1. **The allegation is malicious** – the supply worker will be able to continue to work in regulated activity and can continue working through our agencies.
  2. **The allegation is unsubstantiated** – the supply worker will be able to continue to work in regulated activity and can continue working through our agencies.
  3. **The allegation is unfounded** – the supply worker will be able to continue to work in regulated activity and can continue working through our agencies.
  4. **The allegation is substantiated and the harm level has been reached** – the supply worker will not be able to continue being registered with Vision for Education, ABC Teachers and Smart Teachers.
  5. **The allegation is substantiated but the harm level has not been reached** – then the supply worker will be invited to a safeguarding review meeting and a decision will be made as to whether the supply worker can continue working through our agencies.

### Safeguarding review meeting

A safeguarding review meeting will be held by a Safeguarding Manager and a note taker. As supply workers are not employees, they do not have the right to be accompanied. However, in the interest of general fairness we will allow a trade union representative or work colleague to accompany the supply worker if they feel that is necessary. If a supply worker intends to be accompanied, then advance notice must be given.

Depending on the seriousness of the incident or allegation, we may also make a report to statutory agencies such as the police, Disclosure Barring Service, Teaching Regulation Authority and the local authority's Child Protection Service.

## 29. Abuse of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

## 30. Referrals to the Disclosure and Barring Service (DBS)

Under Sections 35-45 of the Safeguarding Vulnerable Groups Act 2006, employers have a legal duty to refer to the DBS when permission for an individual to engage in regulated activity is withdrawn, had the individual not resigned, retired, been made redundant or transferred out of regulated/controlled activity because they think the individual has:

- engaged in relevant conduct, and
- satisfied the harm test.

A referral should not wait until the end of the disciplinary process. A withdrawal does not necessarily mean permanent removal, it can include a temporary removal to another role, removing a volunteer from an approved list or suspension in some circumstances.

Guidance on how to make a referral to the DBS can be found on the .Gov website (<https://www.gov.uk/government/collections/dbs-referrals-guidance--2>).

### 31. COVID-19 arrangements for safeguarding

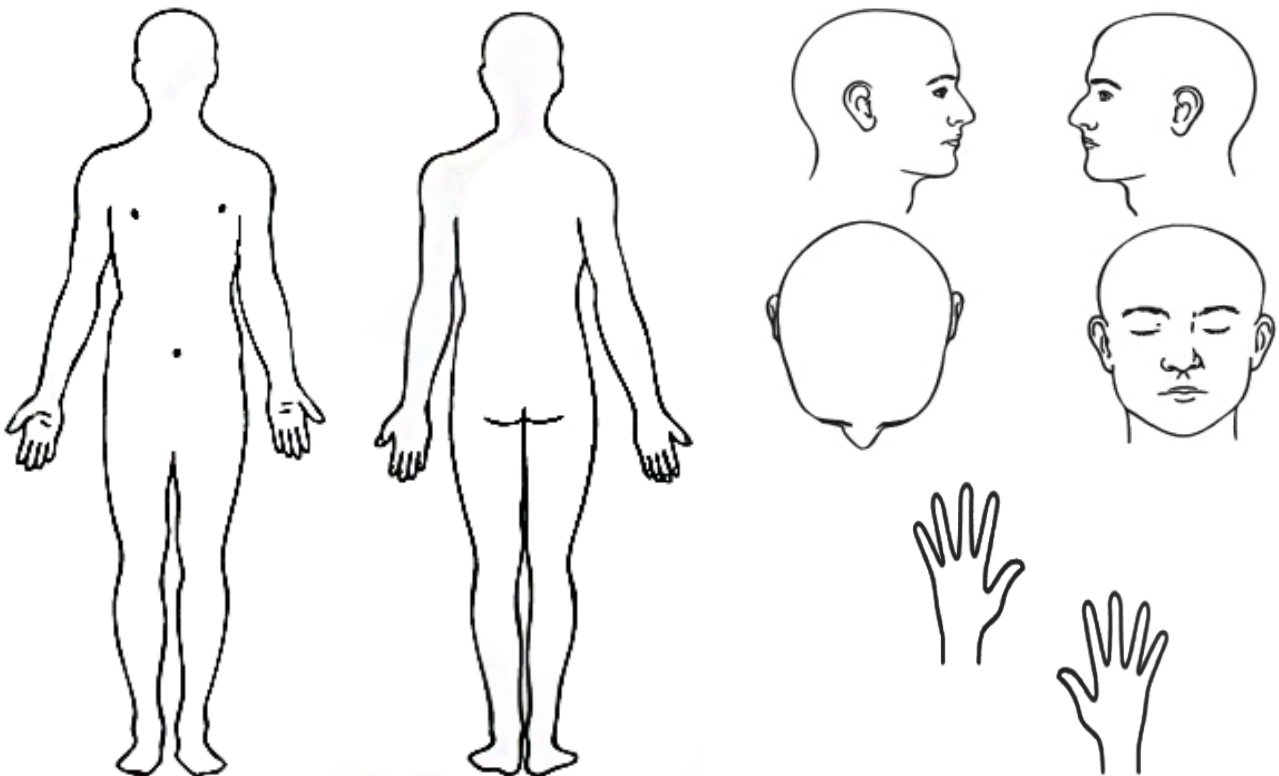
This addition to the Safeguarding and Child Protection Policy is in response to the COVID-19 pandemic and outlines measures taken to ensure that we continue our duty to safeguard children, young people and vulnerable adults.

- All staff can contact the DSL, or where this is not possible, a deputy DSL, to report any safeguarding concerns either by phone, email or video call. All staff are aware of reporting processes and the DSLs continue to engage in multi-agency meetings, which can be done remotely.
- Our own recruitment registration processes have been amended to consider social distancing and the threat of COVID-19. In doing so, we have not compromised on our responsibility to follow safer recruitment processes in accordance with the Department for Education's 'Keeping Children Safe in Education 2020' guidance and other relevant legislation.
- We have extended our offer to provide an online tutoring service. Online conduct and safeguarding policies have been developed and implemented to ensure there is a safe online learning environment for students.
- Before tutors can begin work, they must agree to adhere to these policies. All online sessions are recorded and can be reviewed. If an allegation or child protection concern is raised, we will allow third parties access to these recordings. Use of our online learning system is in line with the General Data Protection Regulation (GDPR) and our Privacy Policy.
- The Disclosure and Barring Service (DBS) has made temporary changes to its guidance on ID checking for standard and enhanced disclosures in response to COVID-19, to reduce the need for face-to-face contact. This change has enabled us to continue recruiting and clearing staff. All our existing risk assessment processes remain in place and we continue our legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child, young person or vulnerable adult.
- Additional COVID-19 health and safety risk assessments are conducted with our active candidates. Prior to a work placement being accepted, candidates must complete a coronavirus health status pre-screen, to ensure they do not have or have not recently come into contact with anyone with coronavirus or coronavirus symptoms, and to check that they are fit for work.

Depending on the answers they provide, and if they live in an area where local lockdown restrictions are in place, we will or will not be able to place them into a booking. Candidates are emailed a copy of the answers they provide, and they need to contact us immediately if any of their answers change in the future.

# Safeguarding Body Map

<b>Child, young person or vulnerable adult's name:</b>	
<b>Date of birth (if known):</b>	
<b>Name of member of staff who witnessed the injuries:</b>	
<b>Date and time injuries seen:</b>	
<b>Date and time info recorded:</b>	
<b>Details of injuries and location on body:</b> <i>(Where they are, what they look like, there colour, shape, size and condition. Is the injury healing or worsening?)</i>	
<b>How was the injury sustained according to the child, young person, vulnerable adult and/or parent or carer?</b>	



<b>What action will be taken?</b>

<b>Date and time received by DSL:</b>	
<b>Name of DSL:</b>	
<b>Agency or school/alternative provision DSL:</b>	<input type="checkbox"/> Agency <input type="checkbox"/> School/alternative provision

# Record of Concern Form

## CHILD PROTECTION INCIDENT RECORDING SHEET

<b>Name of member of staff recording incident:</b>	
<b>Current date and time:</b>	
<b>Name of pupil:</b>	
<b>Class:</b>	
<b>Date of birth:</b>	
<b>Who was present?</b>	
<b>Date and time reported to DSL:</b>	
<b>Names of any other staff informed:</b>	
<b>Names of any other pupils involved:</b>	
<b>Are parents/carers aware? (Give details)</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Date and time of incident:</b>	
<b>Nature of concerns:</b>	
<b>Account of incident:</b>	
<b>Action taken:</b>	
<b>Name of duty worker/social worker if reported:</b>	
<b>Name of any other agencies involved:</b>	
<b>Further action:</b>	
<b>Signed:</b>	
<b>Date:</b>	