





CHILD PROTECTION AND SAFEGUARDING POLICY

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School Contacts	
Designated Safeguarding Lead (DSL)	Sian Williams
Deputy Designated Safeguarding Lead (Deputy DSL)	Cathryn Halton
Any other staff trained to DSL level	Jenny Clough, Stephen Apsey, Clare Dolan, Colin Eayrs, Alyson Ede, Phillip Fowler, Carol Matica, Hannah Messenger, Louise New, Jessica Powell, Annette Thompson
Designated Practitioner with responsibility for safeguarding in early years	Luke Hanna
Deputy Designated Practitioner with responsibility for safeguarding in early years	Richard Cook
Headteacher/Principal	Jenny Clough
Chair of Governors	Stephen King
Board Responsibility	Board Member with responsibility for safeguarding is Dr Matt Burkes

Local Authority Contacts		
Our school follows the safeguarding protocols and procedures of our safeguarding Chichester MASH Hampshire resident referrals: Portsmouth Brighton: Surrey:	Telephone:	Out of hours
	01403 229 900	0330 2226668
	0300 555 1384	0300 555 1373
	0845 671 0271	0300 555 1373
	01273 290400.	01273 335905
	0300 470 9100	01483 517898
For advice prior to calling MASH IPEH (Integrated Prevention Earliest Help)	07860 858 654 (ARUN) (Bognor Littlehampton) 07809 230260 (Chichester)	
The Designated Officer for child protection (sometimes referred to as the LADO)	Lindsay Tunbridge -Adams 0330 222 3339	
Local authority Prevent Lead	Beverley.knight@westsussex.gov.uk	

Police	
Local Police Emergency	999
Local Police non-emergency PC Sarah Pack	101 07818 406913

Location of local authority safeguarding and child protection documents in school	
Local authority documents, e.g. thresholds, referral forms and related guidance can be found:	CPOMS for all safeguarding referrals https://chichesterfree.cpoms.net Safeguarding Policy: S:\Staff Forms & Policies\Policies

National Contacts	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858



NSPCC ChildLine	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline (Channel for advice) for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

Child Protection and Safeguarding Policy

VISION AND ETHOS

Chichester Free School will:

- **Nurture** children in a safe, happy and caring environment where every child will be known, positive behaviour is rewarded and there will be a strong sense of community between child, home, school and community
- **Challenge** children to recognise and respect one another so we all may learn and grow together. Our curriculum, including the extended day provision, will stimulate and challenge every individual, inspiring a passion for learning. Such challenge requires courage on the part of all members of our community.
- **Inspire** children towards the highest standards of behaviour as the foundation for individual success and a culture of well-being, warmth and exciting futures. We will inspire confident, happy, creative and articulate young people who will emerge with a clear vision for their future

Chichester Free School's pastoral care is based on the four Cardinal Virtues of Wisdom, Temperance, Justice and Courage:

- **Wisdom** – The wisdom to recognise the importance of context, history, circumstance and intention in every act. We wish to create a culture where the contexts and circumstances of everyday life enable all members of our community to intend excellence in behaviour and achievement. The wisdom to praise effort as much as achievement and to choose well now, even when this is the harder path.
- **Temperance** – To seek self-control so all members of the community act thoughtfully, internalising self-regulation, rather than giving in to impulse or always relying on others to set boundaries. We will be modest in asserting our own rights, prudent in exercising our energies, resilient when faced with difficulty, demonstrating humility and forgiveness in our dealings with others.
- **Justice** – To act fairly, finding evidence first, not fault. To recognise that behaviour is an act carried out by a person. Whether rewarding or punishing, we seek to build the character of the individual and the school through the just actions we take in response. We will listen proactively to all members of the community to form the just culture of the school. To demonstrate justice every day in the respect we show for all members of the community and beyond, and for the material fabric of the school.
- **Courage** – The courage to do what is right when doing what is right is hard, to challenge poor behaviour, speak up for minority groups, or those who are being mistreated and the courage to seize opportunities despite what others might think.

Circulation: This policy is addressed to all Governors, teaching and support staff including any peripatetic self-employed staff using Chichester Free School premises, school medical and nursing staff and any volunteers working in or on behalf of the school in either a paid or unpaid capacity. It will be supplied to parents and students on request and can be viewed on the open section of the school website. All staff must read and take note of the key information in the 8 page version of “Keeping Children Safe in Education” (2016) which can be found at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

Definition: Child protection also means safeguarding, as a proactive approach involving planning to keep children safe rather than just reacting to a crisis when a child is not safe. This policy reflects our commitment to safeguarding and complies with the DoE publications “Keeping Children Safe in Education” (2016) and “Working Together to Safeguard Children” (Feb update 2017).

CHILD PROTECTION KEY CONTACTS

Chichester Free School Designated Person for Child Protection

Sian Williams (Head of School (Secondary))

Contact details: email swilliams@chichesterfreeschool.org.uk

Tel: 01243 792690

Chichester Free School Deputy Designated Person for Child Protection

Cathryn Halton (SENCO)

Contact details: email chalton@chichesterfreeschool.org.uk

Tel: 01243 792690

Chichester Free School Designated Governor for Child Protection

Matt Burkes

Contact details: email mburkes@chichesterfreeschool.org.uk

POLICY STATEMENT

1. Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. See appendix 3 for more detailed definitions of the types of abuse.
2. Our policy and our commitment at Chichester Free School is to take all reasonable measures to safeguard and be vigilant; promoting the welfare of each student in our care and:

- to ensure that we practise safe recruitment in checking the suitability of staff and volunteers to work with children and young people.
 - to protect each student from any form of abuse, whether from an adult or another student.
 - to be alert to signs of abuse both in the School and from outside.
 - to deal appropriately with every suspicion or complaint of abuse.
 - to design and operate procedures which promote this policy and which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.
 - to support any child who has been abused, in accordance with his/her agreed child protection plan.
 - to be alert to the needs of children with medical conditions.
 - to operate robust and sensible health and safety procedures.
 - to take all practicable steps to ensure that school premises are as secure as circumstances permit.
 - to operate clear and supportive policies on drugs, alcohol and substance misuse.
 - to consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our school or in our local area.
 - to have regard to guidance issued by the Secretary of State for Education and Skills in accordance with section 157 / 175 Education Act 2002 and associated regulations.
 - to establish and maintain an ethos where students feel secure and are encouraged to talk and are listened to.
 - to ensure students know that there are adults in the School whom they can approach if they are worried or in difficulty.
 - to uphold and develop each student's self-esteem, security, confidence, assertiveness, independence and personal safety skills.
 - to help students to acquire skills and attitudes to stand against abuse in their own lives and to prepare them for responsibilities, including parenthood, in their adult lives.
 - to encourage all students towards a positive self-image.
 - to help students to make reasoned, informed choices, judgements and decisions.
 - to establish effective communication between students, teachers, parents and support agencies.
 - to provide guidelines for all Chichester Free School staff in cases of suspected or disclosed abuse.
 - to remedy without delay any deficiencies or weaknesses in safeguarding arrangements
3. Every complaint or suspicion of abuse from within or outside the School will be investigated and in all proper circumstances will be referred to an external agency such as Children's Social Care, Think Family and early help, the child abuse investigation unit of the police (CAIU) or the NSPCC in accordance with the procedures published by West Sussex Local Safeguarding Children Board. An anonymous report will be acted upon in the same manner as any other report but this fact will be kept in mind when considering the context of allegation.

The Designated Person

4. The School has appointed a senior member of staff ("Designated Person") to be responsible for matters relating to child protection and welfare. The main responsibilities of the Designated Person are:
- To be the first point of contact for parents, students, teaching and support staff, external agencies and any other in all matters of child protection.

- To ensure all staff are aware of the need to be alert to signs of abuse and know how to respond to a student who may tell of abuse.
 - To co-ordinate the child protection procedures in the School.
 - To ensure the Continuing Professional Development Coordinator provides an ongoing training programme for all teaching staff and the Business Manager does likewise for all support staff.
 - To monitor the keeping, confidentiality and storage of records in relation to child protection.
 - To liaise with the local authority Children's Social Care.
 - To ensure that all students are encouraged to talk and that students know whom to approach with any concerns.
 - To ensure that the duty of care towards students and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice.
5. The Designated Person is the Head of School (Secondary), Mrs Sian Williams, who may be contacted on 01243 792690 and swilliams@chichesterfreeschool.org.uk. She will:
- Advise and act upon all suspicion, belief and evidence of abuse reported to her.
 - Keep the Designated Governor informed of all actions unless the Designated Governor is the subject of a complaint.
 - Liaise with Social Care and other agencies on behalf of the School.
 - Speak at School assembly early in each Autumn term about child protection and the adults to whom students with concerns should turn.
 - Remind all staff of their responsibilities at the beginning of each term
 - Be the person with whom all staff may raise concerns, verbally, through written concern forms (which can be found on the Reception desk), or via email
6. If the Designated Person is unavailable or is herself the subject of a complaint, her duties will be carried out by the SENCO, Mrs Cathryn Halton, who can be contacted on 01243 792690 and chalton@chichesterfreeschool.org.uk
7. The Designated Person on the Primary site is Mr Luke Hanna and all primary staff should contact him in the first instance, he will then contact Mrs Williams.
8. The Designated Person has undertaken appropriate training and will attend refresher DSL training at two-yearly intervals, with update training occurring at least annually. Anyone deputising for the Designated Person will also undertake appropriate DSL training.
9. The school has appointed a governor ("Designated Governor") to oversee matters relating to child protection. The governor is Matt Burkes. The designated Governor has undertaken appropriate training and will attend refresher DSL training at three-yearly intervals.
- The Designated Person will inform the Designated Governor of all matters to be referred to Children's Social Care.
 - The Designated Governor is responsible for ensuring that the School's procedures are consistent with West Sussex Local Safeguarding Children Board procedures.
 - The Designated Governor is responsible for managing allegations regarding the Head of School (Secondary) and the Principal.
 - The Designated Governor should undergo appropriate training no less than every three years.

10. Each student has the right:

- to be free from any abuse.
- to have staff in School with whom they can feel confident to discuss any concerns regarding child protection.
- to have their self-esteem and self-confidence nurtured at all times.
- to be educated in personal safety skills, the responsibilities of parenthood and how to become a responsible citizen, free from discrimination on the grounds of gender, disability, sexual orientation, race, creed or background.

11. Signs of abuse

Possible signs of abuse include (but are not limited to):

- The student says s/he has been abused or asks a question which gives rise to that inference.
- There is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries.
- The student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour.
- The student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- The student's development is delayed.
- The student loses or gains weight.
- The student appears neglected, e.g. dirty, hungry, inadequately clothed.
- The student is reluctant to go home, or has been openly rejected by his/her parents or carers.
- Peer on peer abuse can also occur and should not be passed off as 'banter' or 'part of growing up'. This includes Sexting and all staff must be aware of the different gender issues which can be part of this kind of abuse

See appendix 4 for guidance on recognising different types of abuse. Please also note the recent guidance on Female Genital Mutilation (FGM) to be found at Appendix 13, as well as that on Online Safety in Appendix 15, Honour Based Violence and Forced Marriage in Appendix 16 and preventing Radicalisation in Appendix 17

12. Duty of the School

The School has the responsibility to:

- Provide an environment free from any abuse or discrimination.
- Provide a designated teacher for child protection as part of the SLT.
- Respect each student's rights to privacy regarding abuse but within the requirements of this policy.
- Train all staff to be aware of the possibility of abuse and potential signs to observe.
- Inform all staff who work with children of the arrangements for child protection.
- Nurture each student's self esteem and confidence at all times.
- Educate students to respect everyone, to develop personal safety skills and to become well rounded members of society.
- Liaise with Children's Social Care if abuse requiring a referral is suspected.

- Inform parents of the School's Child Protection Policy.
- Publish the School's Child Protection Policy on the open section of the website
- Transfer information to the new school when a student with a child protection plan or about whom there have been child protection concerns in the preceding year leaves, ensuring secure transit and confirmation of receipt should be obtained. If the School does not know where the student has moved to, then the LA Children's Social Care will be contacted.
- Implement and monitor an anti-bullying policy.
- Implement a policy on physical intervention.
- Ensure child protection procedures are in place for all activities reasonably under school jurisdiction, to include out of school provision, trips and visits as well as all activities within the regular school day
- Ensure the School and all staff are aware of the duty to stop vulnerable and susceptible people from becoming terrorists or supporting violent extremism. This is a form of safeguarding.
- Ensure that all action is taken to prevent any pupil become a child 'missing education'

13. Duty of employees

Every employee of the School is under a general duty:

- To protect children from abuse.
- To be aware of the School's child protection procedures and to follow them.
- To have read this policy, Part 1 of *Keeping Children Safe in Education (2016)* and the School's Guidance on Safe Working Practice. All of these documents will be provided at the commencement of employment and once a year when updated. All staff must contact the Principal as Designated Person for Child Protection to confirm that they have read these three documents.
- To know how to access and implement the procedures, independently if necessary.
- To keep a sufficient record of any significant complaint, conversation or event.
- To report any matters of concern to the Designated Person. This may be verbally, through written concern forms (which can be found on the Reception desk), or via email.
- To undertake appropriate training including refresher training at three-yearly intervals and updates at least annually.
- To follow guidance on appropriate professional behaviour to ensure that students and staff are not placed at risk of harm or risk of allegation of harm (for details of appropriate professional practice refer to the Staff Code of Conduct in the Employment Manual and the document "Guidance for safe working practice for the protection of students and staff at Chichester Free School")
- To know when to pass on safeguarding concerns for intervention by Early Help, which might be part of identifying emerging problems. The process for this is similar to raising all other concerns, ie. liaising with the designated person for child protection, or other pastoral leader, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

See appendix 1 for more detail on the responsibilities all staff have to protect children from abuse. Also, see appendix 2 for more detail on guidance when talking with children when a child protection issue is a possibility. It is important to remember here that it is best practice to **ask yourself 'is the student safe'** and that you **cannot offer students confidentiality and must not ask leading questions**.

There's always someone to talk to about child protection concerns in school. If in any doubt, or if you have any concerns then talk with a pastoral leader or the designated person for child protection.

It is important for all staff to remember that in exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care as *Keeping Children Safe in Education (2016)* states: "If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point."

Contact details can be found in section 16 of this policy.

14. Initial Complaint

A member of staff suspecting or hearing a complaint of abuse must not investigate it beyond the point at which it is clear that there is an allegation. In particular, the member of staff:

- Must listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- Must not ask leading questions, that is, a question which suggests its own answer.
- Must reassure the child but not give a guarantee of absolute confidentiality and explain the need to pass the information to the Designated Person who will ensure that the correct action is taken.
- Must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Person.

See appendix 2 for further guidance on talking to a child when a child protection issue is a possibility.

15. Preserving Evidence

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

16. Reporting

All suspicion or complaints of abuse must be reported to the Designated Person promptly and certainly within 24 hours, or if the complaint involves the Designated Person, to his/her deputy or to the Designated Governor.

If the complaint is about the Principal the complaint should be reported to the DSL who will then contact the Designated Governor.

The Designated Person will brief the Designated Governor on all cases, unless the Designated Governor is themselves the subject of the complaint, and will report to the Designated Governor for Child Protection if a referral to Children's Social Care is to be made.

17. Action by the Designated Person

The action to be taken will take into account:

- The Sussex Child Protection and Safeguarding procedures displayed on the website <http://sussexchildprotection.procedures.org.uk/>

- Any incident involving a serious criminal offence will always be referred to Children's Social Care or the police without further investigation within the School.
- The wishes of the student who has complained, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions need to be taken, after all appropriate consultation, that override a student's wishes.
- The wishes of the complainant's parents provided they have no interest which is in conflict with the student's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Person is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose. As part of the risk assessment consideration will be made of the risk that disclosure would lead to key evidence being destroyed.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of the school community as a whole including its employees and its insurers.
- If there is room for doubt as to whether a referral should be made, the Designated Person may consult with Children's Social Care or other appropriate professionals on a no names basis without identifying the family.
- However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the Designated Person will confirm the referral in writing to Children's Social care within 24 hours. A multi-agency referral form will be used for this purpose (see appendix 10). If no response or acknowledgment is received within three working days, the Designated Person will contact Social Care again.

Contact Details for Designated Person:

- Multi Agency Safeguarding Hub (MASH): 01403 229900
- Email: mash@westsussex.gcsx.gov.uk please include your address and phone number
- Address: Multi Agency Safeguarding Hub
Fourth Floor
County Hall North (Parkside)
Chart Way
Horsham
West Sussex
RH12 1XH
- Out of hours: 0330 222 6664 weekdays between 5.00pm and 8.00am, weekends and bank holidays 24 hours a day
- Think Family and Early Help: <https://www.westsussex.gov.uk/social-care-and-health/social-care-and-health-information-for-professionals/children/think-family/think-family-and-early-help/>

18. Referral Guidelines

A referral to Children's Social Care or police will be made after due consideration of:

- the wishes of a student complainant who is of sufficient maturity and understanding and properly informed, and also the wishes of the complainant's parents; and

- satisfactory information gathering, dealt with under the School's internal procedures, the parents being kept fully informed, as appropriate; and
- appropriate risk assessments of the needs of the child / children concerned and others

When making a referral of a case of suspected or alleged abuse, the Designated Person will ask to be informed of the timing of the strategy discussion between the statutory agencies which will decide whether and how to investigate. The Designated Person will clarify with the investigating agencies when, how and by whom the parents and the student will be told that a referral has been made. A member of staff, either the Designated Person or the member of staff who knows the student best, will be prepared to contribute to the strategy discussion the School's knowledge of the student.

When deciding whether to make a referral, following an allegation or suspicion of abuse, the designated person for child protection shall not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the local authority designated officer (LADO). This may be done tentatively and without giving names in the first instance. The school should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse

19. External Agencies

Whether or not the School decides to refer a particular complaint to Social Care or the police, the complainant (in the case of a student this means the student and his/her parents) will be informed in writing of their right to make their own complaint or referral to Children's Social Care or the Child Abuse Investigation Unit of the police and will be provided with contact names, addresses and telephone numbers, as appropriate.

20. Allegations Against Staff

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in an education setting is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The School has procedures for dealing with allegations against staff and volunteers in Appendix 8 of this Policy and in the Staff Employment Manual. These aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations.

A school employee who is the subject of an allegation of abuse may be asked to take leave of absence or may be suspended pending the outcome of the investigation. This is decided by the Principal in consultation with the Local Authority Designated Officer, or Designated Officer Team. (If the allegation involves the Principal then the Designated Governor makes this decision.). Appendix 20 is the required 'Agency Reporting Form for Allegations Against Staff and Volunteers Working With Children in West Sussex'. There are further directions on when and how to use this form within the Appendix.

The Principal and LADO, or Designated Officer Team, will need to take into account the seriousness and plausibility of the allegation, the risk of harm to the student concerned or to other students, and the possibility that evidence has been tampered with, as well as the interests of the person concerned and the School. Suspension would be a neutral act, not a disciplinary sanction and would be on full pay.

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the students or student concerned; and
- the need for a full and fair investigation.

Should the school no longer require the services of any person (employed, contracted, volunteer or student) because he or she is considered unsuitable to work with children then this will be reported to the Disclosure and Barring Service as soon as possible and certainly within one month

The full process is outlined in appendix 8.

21. Allegations Against Students

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. Procedures outlined in the School's anti-bullying, behaviour, equal opportunities and student welfare policies will apply.

22. Suspected Harm from Outside the School

A member of staff who suspects that a student is suffering harm from outside the School should seek information from the child with tact and sympathy using "open" and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned he or she should refer the matter to the Designated Person.

23. Allegations of Harm arising from Underage Sexual Activity

- Cases of underage sexual activity which present cause for concern are likely to raise difficult issues and will be handled particularly sensitively.
- A child under 13 is not legally capable of consenting to sexual activity. Any offence under the Sexual Offences Act 2003 involving a child under 13 is very serious and will be taken to indicate a risk of significant harm to the child.
- Cases involving under 13s will always be discussed with the designated person. Under the Sexual Offences Act, penetrative sex with a child under 13 is classed as rape. Where the allegation concerns penetrative sex, or other intimate sexual activity occurs, there would always be reasonable cause to suspect that a child, whether girl or boy, is suffering or is likely to suffer significant harm. There will be a presumption that the case will be reported to Children's Social Care and that a strategy discussion will be held in accordance with this guidance. All cases involving under 13s will be fully documented including detailed reasons where a decision is taken not to share the information.
- Sexual activity with a child under 16 is also an offence. Where it is consensual it may be less serious than if the child were under 13, but may nevertheless have serious consequences for the welfare of the young person. Consideration will be given in every case of sexual activity involving a child aged 13-15 as to whether there should be a discussion with other agencies and whether a referral should be made to children's social care.
- The designated person should make this assessment using the considerations in appendix 9. Within this age range, the younger the child, the stronger presumption must be that sexual activity will be a matter of concern. Cases of concern should be discussed with the designated person and subsequently with other agencies if required. Where confidentiality needs to be preserved, a discussion can still take place as long as it does not identify the child (directly or indirectly). Where there is reasonable cause to suspect that significant harm to a child has

occurred or might occur, there will be a presumption that the case is reported to children's social care and a strategy discussion will be held to discuss the appropriate next steps. This should include cases where both parties are under the age of 16, especially where there is an age imbalance. All cases will be carefully documented including where a decision is taken not to share information.

- Sexual activity involving a 16 or 17 year old, though unlikely to involve an offence, may still involve harm or the risk of harm. Staff should still bear in mind the considerations and processes outlined in the above guidance in assessing the risk, and should share information as appropriate. It is an offence under section 16 of The Sexual Offences Act 2003, for a person to have a sexual relationship with a person under the age of 18 if they hold a position of trust or authority in relation to them.

24. Recruitment

The School has a written recruitment and selection policy which details all aspects of the recruitment process and ensures the school operates safe recruitment procedures. This policy reflects guidance in the DofE publication "Keeping Children Safe in Education" (2016)

This policy details the following to address Child protection issues:

- There is a clear statement that "Chichester Free School is committed to safeguarding and promoting the welfare of all its students and expects all staff and volunteers to share this commitment. All postholders are subject to a satisfactory enhanced DBS disclosure." in all recruitment materials, induction training and job descriptions.
- No one on the DBS Children's Barred List will be employed by Chichester Free School.
- There will be one suitably trained person on each selection panel for every appointment made within the school who will advise on child protection matters pertaining to interviewees, this person will have completed safer recruitment training provided by the Children's Workforce Development Council (CWDC) or other appropriate body. Before any appointment there will always be a face-to-face interview that explores the candidate's suitability to work with children as part of ascertaining his/her suitability for the post. All interviewees will be questioned on their awareness of child protection issues.
- All posts will be advertised.
- All posts will use application forms (CVs are optional additions) and all applicants will list employment history with exact dates and explain all gaps.
- The recruitment materials will explain that the post is exempt from the Rehabilitation of Offenders Act 1974, and that all convictions, cautions and bind-overs, including those regarded as "spent" must be declared when applying. The applicant will be told that the declaration can be posted with the application in a sealed envelope marked "Private – Principal's eyes only".
- All job descriptions will make reference to the responsibility for safeguarding and promoting the welfare of children; all person specifications will include reference to suitability to work with children and that this will be explored at interview
- Referees will be approached for all short-listed candidates, including internal applicants, and will be sent the job description and person specification. A written reference will always be taken from the most recent employer. If the applicant is not working with children but has done so in the past an additional reference will be obtained from the employer by whom the applicant was most recently employed to work with children. Referees will be provided with a standard reference pro-forma that asks for general comments on the candidate's performance history and conduct.
- No open references will be accepted and references will be obtained directly from referees.
- We will carry out DBS checks at enhanced level on all employees.

- Catering staff, overseas staff, any agency staff, trainee teachers, supply teachers, gap students, students on work experience at Chichester Free School, regular volunteers (weekly or more frequently), governors, contractors and taxi/coach drivers must either have enhanced DBS (or a declaration from the appropriate overseas police force) and have shown a birth certificate (not a photocopy) or not ever be allowed to be unaccompanied with students. Where supply agencies provide supply staff there must be written confirmation from the agency of the relevant person's DBS clearance and an identity check must be completed at School to ensure that same person on whom checks have been made is the one arriving to work at School on a supply basis.
- Volunteers on an irregular basis who are not DBS checked cannot supervise students on a residential trip and cannot be the only supervisor of a solo student. (A named member of staff must be responsible for each person in that category). If a volunteer is not engaging in what "Keeping Children Safe in Education" (2016) describes as 'regulated activity', then Chichester Free School should undertake a risk assessment and use professional judgement and experience when deciding whether to seek an enhanced DBS check. We will consider: the nature of the work with children; what we know about the volunteer, including formal or informal information offered by staff, parents and other volunteers; whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability; and whether the role is eligible for an enhanced DBS check.
- Supervised volunteers have been removed from the category of regulated activity following The Protection of Freedoms Act 2012 amending the Safeguarding Vulnerable Groups Act 2006. If the volunteer is to be supervised while undertaking an activity which would be regulated activity if it was unsupervised, then statutory guidance must be followed. The guidance issued following this change requires that: there must be supervision by a person who is in regulated activity; the supervision must be regular and day to day; and the supervision must be "reasonable in all the circumstances to ensure the protection of children".
- Chichester Free School is not legally allowed to request a barred list check on a volunteer who, because they are supervised, is not in regulated activity.
- The Principal will be required to complete a Pre-Employment Disclosure Risk Assessment Form (Appendix 11), for any individual who shall be employed or engaged as staff member or volunteer in regulated activity prior to receipt of DBS clearance. This will only be in the most exceptional instances and in any case will require the individual concerned already to have made application to the DBS and provided identification documents.
- Any contract requiring a contractor to employ staff to work with, or provide services to students, will require the contractor to implement measures to fulfil the requirements of this policy.
- Assurances will be obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's students on another site.
- Proof of identity will be obtained from a photo identity (driving licence or passport) from all employees without exception and a copy will be kept on file. Exam and degree certificates and/or certificates of professional qualifications will be requested from all employees for whom this is appropriate and copies will be kept on file.
- Teaching duties and others defined as 'regulated activity' in "Keeping Children Safe in Education" (2016) cannot be taken up before a DBS check is complete; other duties not defined as 'regulated activity' require the School to undertake a risk assessment and use professional judgement and experience when deciding whether to seek an enhanced DBS check. In either case an original birth certificate must have been produced.
- There is no requirement to obtain an enhanced DBS check if, in the three months prior to beginning work in their new appointment, the applicant has worked: in a school in England in a post which brought them into regular contact with children or in any post in a school since 12 May 2006; or in a college in England in a position which involved the provision of education and

regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18. But a Chichester Free School may request an enhanced DBS check with barred list information should there be concerns and bearing in mind the duty schools are under not to allow a barred person to work in regulated activity.

- All teaching staff and those considered to be in ‘teaching work’ will have their right to teach checked by use of the NCTL’s Teacher Services system, including staff from the EEA. This is the ‘Prohibition from Teaching’ check and will be recorded on the Single Central Record
- The DBS Update service allows for vetting checks to have ‘portability’, that is say be taken from one employer to another, as long as the person has registered with the update service at the point the check was received or within 19 days of receiving it.
- The revised ‘Keeping Children Safe in Education 2016’ says:
- ‘Before using the Update Service schools or colleges must
- a. obtain consent from the applicant to do so;
- b. confirm the certificate matches the individual’s identity; and
- c. examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g. enhanced certificate/enhanced including barred list information’.
- All relevant staff at Chichester Free School will be required to provide relevant information to satisfy the requirements of ‘Disqualification by association’, as all relevant staff could come into contact with children aged 8 or under in the course of their duties.
- The supplementary advice on childcare disqualification requirements states that:

“In addition to inclusion on the Children’s Barred List, the wider disqualification criteria include:

- being cautioned for or convicted of certain violent and sexual criminal offences against children and adults;
- grounds relating to the care of children (including where an order is made in respect of a child under the person’s care);
- having registration refused or cancelled in relation to childcare or children’s homes or being disqualified from private fostering;
- living in the same household where another person who is disqualified lives or works (disqualification ‘by association’).

When requesting information the School will require:

- details of any order, determination, conviction, or other ground for disqualification from registration under the Childcare (Disqualification) Regulations 2009;
- the date of the order, determination or conviction, or the date when the other ground for disqualification arose;
- information about the body or court which made the order, determination or conviction, and the sentence (if any) imposed; and
- a certified copy of the relevant order (in relation to an order or conviction).
- Any relevant information passed to the school must be provided to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware of the information or ought reasonably to have become aware of it if they had made reasonable enquiries.

25. Whistleblowing

All staff have a duty to follow the whistleblowing procedures as given in the School's *Whistleblowing Policy*. This may be for concerns about an adult's behaviour or relationships with children, or with the application of the safeguarding or any other policies by those in a position of authority within the School.

The NSPCC has a dedicated Whistleblowing helpline on this number: 0800 0280285. Further information can be found here: <https://www.nspcc.org.uk/fighting-for-childhood/news-opinion/new-whistleblowing-advice-line-professionals/>

26. Prevention of radicalisation towards extremism and terrorism

The Principal and Designated Person for Child Protection and their Deputy, will ensure that the Government's PREVENT strategy is understood by all staff and is effective in preventing vulnerable or susceptible children from being drawn towards extremism and/or terrorism through the following:

- Ensuring staff understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. Staff must know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it.
- Effective staff training, which includes: Knowledge to identify children at risk of being drawn into terrorism; Skills to challenge extremist ideology; Awareness of how to refer children and young people for further help.
- Risk Assessment
- IT policies, including effective filtering software, monitoring of its use and education
- Ensuring that any visiting speakers are suitable and are appropriately supervised.

Should there be a need to refer a person at risk of radicalisation to Channel (the multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism) this will be undertaken by the Principal.

Please see **Appendix 17** for further information.

27. SEND

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. CFS will ensure that all staff are aware of the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

28. Children Missing Education

Children missing education (CME) 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, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

It is therefore essential safeguarding practice that when any child leaves CFS there is an efficient process in place to ensure that no child is at risk of missing education. **Appendix 18** outlines the School's responsibilities when any child leaves our roll. Further information can be found in the statutory guidance *Children Missing Education (September 2016)*.

29. Sexting and Youth Produced Sexual Imagery

Sexting is difficult to define, but can cause harm to all those involved. **Where it occurs then all staff at CFS have a duty to refer it on to a line manager or the designated people for child protection as it is potentially a safeguarding matter.** This will follow the normal process for raising concerns.

Advice on peer on peer abuse and sexting produced by the UK Council for Child Internet Safety (UKCCIS *Sexting in Schools and Colleges: Responding to incidents and safeguarding young people*), provides guidance for schools on what to do should a sexting or similar incident occur in School. Further information, including UKCCIS definition of sexting, or youth produced sexual imagery, and a useful flowchart for responding to incidents can be found in **Appendix 19**. The UKCCIS guidance should be read alongside *Keeping Children Safe in Education* statutory guidance and the non-statutory *Searching, Screening and Confiscation* advice for schools.

Sexting and youth produced sexual imagery are safeguarding concerns. When considering any incident it is important to take into account the following factors:

- Vulnerability of the child
- Coercion
- How the images have been shared and where
- Impact on children
- Age of the children

When considering if there is a need to refer those designated staff at School should take into account the following:

- Adult involvement
- Coercion or blackmail
- Whether the images are extreme or violent
- If any party is under 13
- The immediate risk of harm



30. Monitoring

The Designated Person will monitor the operation of this policy and its procedures and make an annual report on safeguarding practice to the Board of Governors and the safeguarding team of the local authority.

This process of annual review should ensure that the school's policy and procedures are in accordance with statutory and local authority guidance and that any deficiencies or weaknesses in safeguarding arrangements and the efficiency with which associated duties are discharged are identified and remedied without delay.

31. Promotion of this Policy

All school prospectuses will contain, in the additional information, the statement "Chichester Free School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment".

32. Complaints

If a parent (or a student aged 16+) considers that the School has not operated this policy correctly, he or she may submit a complaint under the School's formal complaints procedure, a copy of which is available on request.

[
Chairman of the Governing Body

[
Principal

Legal Status: Complies with "Keeping Children Safe in Education" (2016) and "Working Together to Safeguard Children" (Update Feb 2017), What to do if you're worried a child is being abused (2015).

Policy Date: September 2016

Review Date: September 2017

Appendix 1

THE RESPONSIBILITIES OF ALL STAFF

- All staff (teaching and support) have a responsibility to protect each student from abuse; this means that if you have a concern about a student, you should talk to your pastoral line manager, the Business Manager or the Designated Person as appropriate, and certainly within 24 hours of the concern being raised. This may be verbally, through written concern forms (which can be found on the Reception desk), or via email. All staff must read this policy, the 8 page version of *Keeping Children Safe in Education (2016)* and the School's Guidance on Safe Working Practice. All of these documents will be provided at the commencement of employment and once a year when updated. All staff must contact the Head of School (Secondary) as Designated Person for Child Protection to confirm that they have read these three documents.
- Any lesson or activity may raise the sensitive issue of child abuse; be alert to the impact of the issues raised.
- Respect a student's right to privacy so that only the people who need to know are party to details of any possible abuse to that student. In the first instance this is only the relevant pastoral leader and the Designated Person.
- It is important for all students to acquire and develop skills for personal safety. This will primarily be delivered via PSHE but all teaching staff in any lesson or activity can contribute.
- Because of their day to day contact with individual students, teachers and other staff in the education service are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop. Bruises, lacerations and burns may be apparent, particularly when children change their clothes for physical education and sports activities. Possible indicators of physical neglect, such as inadequate clothing, poor growth, hunger or apparently deficient nutrition, and of emotional abuse, such as excessive dependence or attention-seeking, may be noticeable. Sexual abuse may exhibit physical signs, or lead to a substantial behavioural change including precocity or withdrawal. These signs and others can do no more than give rise to suspicion – they are not in themselves proof that abuse has occurred. But teachers should be alert to all the signs.
- The appointment of a Designated Person should not be seen as diminishing the role of all members of staff in being alert to signs of abuse and being aware of the procedures to be followed, including those in cases where an accusation is made against a member of the school's staff.
- Establish ground rules (especially in PSHE lessons) to create a climate of safety so that each student feels secure when participating in activities and is encouraged to listen to others and share their own opinions and insights. Do not allow students to put each other down or force them to become involved in something they find emotionally uncomfortable.

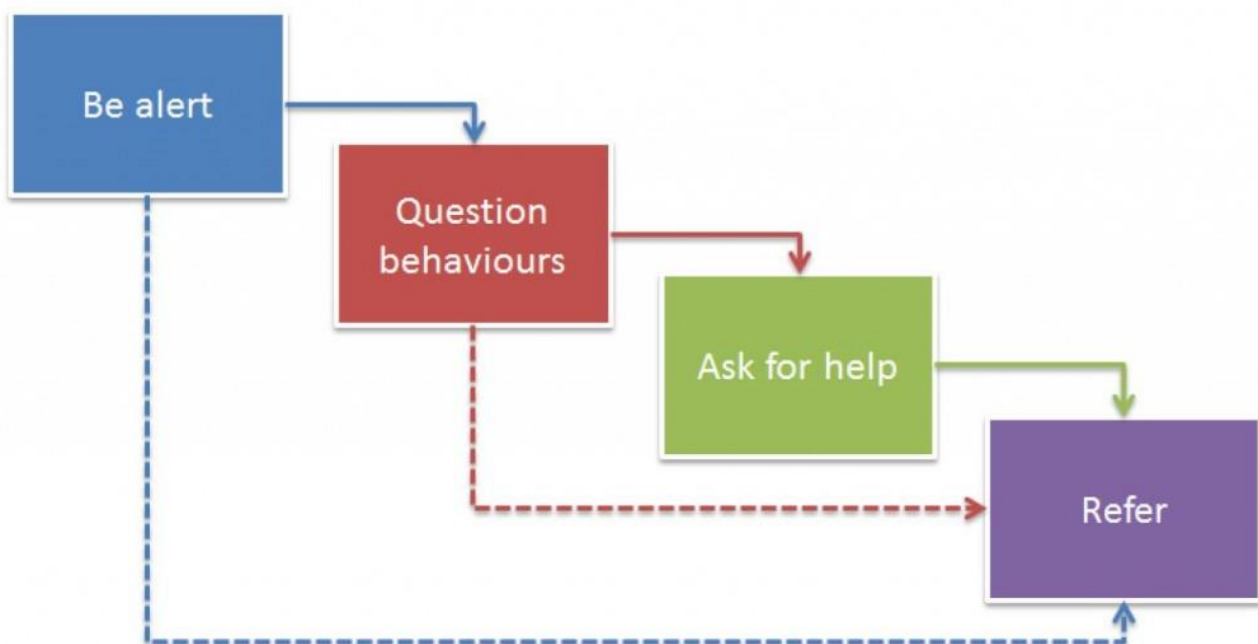
- All teaching staff should seek to develop relationships that will encourage each student to talk about potential abuse but in particular each student's linked pastoral adults must seek to develop relationships whereby any abuse would be likely to be disclosed. Any prolonged breakdown in relationship should be discussed with your pastoral line manager. On the other hand these relationships must be kept on a firmly professional basis with no over-familiarity or undue allocation of time. Pastoral managers will monitor this as it is a fine balance between helpful relationships as described and those which could be a precursor to abuse.
- In general staff should not establish any social contact with students or give their personal details such as home/mobile phone number, home or personal email address or other social networking contact details to students. It is always preferable for students to use the school e-mail address and the school telephone number of staff if this is possible.
- Staff may not use social networking websites for social communication with students nor be the "friend" of current students via such sites (eg Twitter, Facebook etc). Inherently these are sites for social communication and are not appropriate for the teacher-pupil relationship. The exception would be for communication via an approved educational medium, such as the educational website *Edmodo*
- It is an offence for a person to have a sexual relationship with a person under the age of 18 if they hold a position of trust or authority in relation to them.
- Always immediately see a student's linked pastoral adult to discuss concerns or suspicions. Together decide whether to refer the matter to the Designated Person based on available evidence and in accordance with the policy on child protection. He can always contact the Social Services Duty Team Manager to discuss concerns without a formal referral being made.
- Concerns must be formally logged. Remember that teachers often know the student (and sometimes the parents and home) exceptionally well and teachers' training and experience mean that they are well placed to make observations and professional judgments regarding a student's welfare. The record should differentiate between a "one-off incident" that requires immediate action and initially lower level concerns that build up to form a picture of concerns. The latter can take place over time, in different settings and should be shared between staff. See appendix 7 regarding alerting the designated person to potential unwise practice by a colleague.
- Make a written note of the details as soon as possible (see appendix 5 as a guide to what to include). There is no such thing as a "gut feeling"; evidence is based on sound professional judgement and evidence which can be documented. These notes must be passed to the Designated Person and no one else keeps a written or electronic copy (the author may keep a secure copy until the matter is closed). REMEMBER: school staff clarify issues; Police and Social Services investigate.
- In any case of FGM, about a female under the age of 18, it is the mandatory duty of teachers to report any disclosures personally to the police.
- All staff must be aware of the School policy on Use of Images. Staff need to be aware of the potential for images taken as part of teaching to be misused for pornographic or 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. Particular regard needs to be given when they involve young or vulnerable students who may be unable to question why or how the activities are taking place. This advice is particularly important now that it is even easier to take images, whether still or moving with mobile phones or other electronic devices. Our advice will always be to use school equipment

only for such recording and only to do so once consent has been agreed with the line manager, and where necessary the students themselves. In the case of EYFS such recording should only take place with the consent of the Principal. Further information is available in the *Guidance for safe working practice for the protection of staff and students*

It is important for all staff to remember that **anybody can make a referral to social care**, as *Keeping Children Safe in Education (2016)* states: “If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. Anybody can make a referral. If the child’s situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.”

Contact details can be found in section 16 of this policy.

What to do if you’re worried a child is being abused (2015) recommends this simple process:



Guidance and legislation

For current guidance on safeguarding see:

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

And the Sussex Child Protection and Safeguarding Procedures

<https://sussexchildprotection.procedures.org.uk/>

Two documents are particularly helpful:

- The key advice for all school staff in the new “Keeping Children Safe in Education” (2016) document:
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550499/Keeping_children_safe_in_education_Part_1.pdf



- The full guidance document:
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf
- What to do if you're worried a child is being abused (2015):
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Appendix 2

GUIDANCE WHEN TALKING WITH A STUDENT WHEN A CHILD PROTECTION ISSUE IS A POSSIBILITY - INFORMATION FOR ALL STAFF

DO

- **As you first question, ask yourself “is the student safe?”**
- Listen to the student respectfully and with an open mind.
- Remember that often a student will make some attempt to “tell” in the early stages of abuse. If they are not heard they may never try again
- Be accessible and receptive
- Listen carefully and ask open questions to clarify (e.g. who, what, when, where, how)
- Take it seriously (e.g. this is very serious, I'm sad that has happened to you). Abused children are often threatened by the perpetrator that they will not be believed. Listen without value judgements and show the child that you take their problem seriously. Choose a place to talk where you will not be interrupted.
- Reassure the student they are right to tell (e.g. I'm glad you told me, that was the right thing to do)
- Reassure the student it was not their fault. The threats that children live under to keep the secret are very powerful and they will be frightened of the consequences of telling. Reassure the child they have done the right thing. Tell them they are not to blame. Offer ongoing support.
- Do not tell the child how they should feel. Validate their feelings and just listen. Avoid asking questions but feedback what they say if you need to respond verbally.
- Negotiate getting help - Tell the student you are going to get help for them and their family - prepare them for the fact that you **MUST INVOLVE OTHERS**
- Explain - that you cannot personally protect them - but will support them in telling the right people to make sure it does not happen again
- Report - all suspicions or disclosures immediately
- Immediately make careful handwritten and dated records of what was said - using the student's own words and including questions you asked.

DO NOT

- **Offer a student confidentiality**
- **Ask any leading questions whatsoever** (e.g. was it your parent etc. or any questions requiring a YES/NO answer)
- Jump to conclusions
- Try to get the student to disclose - let the student talk and ask only the questions you need to know to clarify immediate safety. The student should not be repeatedly interviewed and the police/social services interview will form the basis of evidence needed to protect the student. Once a disclosure has occurred then reassure etc but terminate the discussion as soon as possible as it is easy to corrupt evidence that the police will later want to use
- Speculate or accuse anybody
- Make promises you cannot keep

Appendix 3

TYPES OF ABUSE - INFORMATION FOR ALL STAFF

The categories of significant harm defined in “Keeping Children Safe in Education” (2016) are:

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. They may be abused by an adult or adults or 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.

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 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: 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 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.

Child Sexual Exploitation

A new statutory definition was clarified within the February 2017 update of *‘Working Together to Safeguard Children’* to be clearer on what Child Sexual Exploitation is;

‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.’

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Further guidance from the DfE on Child Sexual Exploitation can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf?mc_cid=a75521557b&mc_cid=c016723b8b

Please note recent guidance on Female Genital Mutilation (FGM) provided in Appendix 13, as well as that on Online Safety in Appendix 15, Honour Based Violence and Forced Marriage in Appendix 16, preventing Radicalisation in Appendix 17, Children Missing Education in Appendix 18, and Sexting and Youth Produced Sexual Imagery in Appendix 19

Appendix 4

RECOGNISING ABUSE - INFORMATION FOR ALL STAFF

POSSIBLE SIGNS OF SEXUAL ABUSE

Children under the age of five may:

- Become insecure or cling to parent in a fearful way
- Show extreme fear of a particular person
- Become hysterical when clothing is removed, particularly underclothes
- Have some physical signs in the genital or anal areas: smell of semen etc.
- Have soreness or bleeding in the throat, anal or genital areas
- Regress to a much younger behavioural pattern
- Behave in a way sexually inappropriate to their age, being obsessed with sexual matters as opposed to normal exploration
- Stare blankly, seem unhappy, confused, sad
- Become withdrawn, stop eating, have chronic nightmares, begin wetting again when previously dry
- Play out sexual acts in too knowledgeable a way with dolls or other children
- Produce drawings of sex organs such as erect penises
- Stop enjoying activities with other children, such as stories or games
- Seem to be bothered or worried, but won't tell why as if keeping a secret
- Change from being happy and active to being withdrawn and fearful
- Repeat obscene words or phrases said by the abuser
- Say repeatedly that they are bad, dirty or wicked
- Become aggressive and hurtful
- Act in a sexually inappropriate way towards adults

Children from ages of five to twelve may:

- Hint about secrets they cannot tell
- Say a friend has a problem
- Ask if you will keep a secret if they tell you something
- Begin lying, stealing, blatantly cheating in the hope of being caught
- Have unexplained sources of money
- Start wetting themselves
- Exhibit sudden inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Stop enjoying previously liked activities, such as music, sports, art, scouts or guides, gym club
- Be reluctant to undress for P.E
- Become fearful of or refuse to see certain adults for no apparent reason; show dislike of a particular baby-sitter, relative or other adult
- Act in a sexual way inappropriate for their age
- Draw sexually explicit pictures depicting some act of abuse
- Seem to be keeping secret something which is worrying them
- Have urinary infections, bleeding or soreness on the genital or anal areas

- Have soreness or bleeding in the throat
- Have chronic ailments, such as stomach pains or headaches
- Take over the parent role at home, seem old beyond their years (if a victim of incest)
- Become severely depressed, even attempt suicide
- Have a poor self-image, self-mutilate
- Continually run away
- Regress to younger behaviour, such as thumb-sucking, surrounding themselves with previously discarded cuddly toys
- Show discomfort when walking
- Say they are no good, dirty, rotten
- Repeat obscene words or phrases which may have been said during the abuse
- Attempt to sexually abuse another child
- Talk or write about sexual matters
- Find excuses not to go home or to a friend's house after school (where abuse may be happening)
- Act in a sexually inappropriate way towards adults

Young people from the age of twelve onwards may:

- Be chronically depressed
- Be suicidal
- Use drugs or drink to the excess
- Self mutilate, show self-hatred
- Have unexplained pregnancies (any pregnancy in a girl below 14 may be an indicator of Child Abuse)
- Experience memory loss
- Become anorexic or bulimic
- Run away frequently
- Be inappropriately seductive
- Be fearful about certain people like relatives or friends
- Assume the role of parents in the house to such an extent that they do all the cooking, cleaning, child-minding and are taking care of everyone's needs except their own
- Not be allowed to go out on dates or have friends round
- Have soreness/bleeding in the genital or anal areas or in the throat
- Find excuses not to go home or to a particular place
- Have a recurring nightmare/be afraid of the dark
- Be unable to concentrate, seem to be in a world of their own
- Have a "friend who has a problem" and then tell you about the abuse of a friend
- Have chronic ailments such as stomach pains and headaches
- Sexually abuse a child, sibling or friend
- Exhibit a sudden change in school/work habits, become truant
- Be withdrawn, isolated, or excessively worried
- Have outbursts of anger or irritability
- Be fearful of undressing for gym
- Have unexplained sums of money

- Act in a sexually inappropriate way towards adults

POSSIBLE SIGNS OF PHYSICAL ABUSE

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted
- Bald patches
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Chronic running away

POSSIBLE SIGNS OF EMOTIONAL ABUSE

- Physical, mental and emotional development lags
- Admission of punishment which appears excessive
- Over-reaction to mistakes
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (eg: rocking; hair twisting; thumb-sucking)
- Self mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Scavenging for food and clothes

POSSIBLE SIGNS OF NEGLECT

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Low self-esteem
- Neurotic behaviour (eg: rocking; hair twisting; thumb-sucking)
- No social relationships
- Compulsive stealing



- Scavenging for food and clothes

NB. Peer on peer abuse can also occur and should not be passed off as 'banter' or 'part of growing up'. This includes Sexting and all staff must be aware of the different gender issues which can be part of this kind of abuse

Appendix 5

KEEPING RECORDS - INFORMATION FOR ALL STAFF

Specific Concerns

Any member of staff who has a concern about a student should make a written note. This must be passed on to the designated person (Mrs Sian Williams on the Secondary site and Mr Luke Hanna on the Primary site. -although a personal copy may be kept in a secure place). The note should be timed, dated and signed, with your name printed alongside the signature. You must then add the details of the incident to CPOMS, the online child safeguarding system. Any further notes or actions must then be added to CPOMS.

Notes must be made as soon as possible, and certainly within 24 hours of the incident giving rise to the concern. (This is important, in case the note is needed for submission to court).

Notes should be factual, use a student's own words wherever possible and record what you saw and heard.

Professional opinions are acceptable but only if you state the facts upon which your opinion is based.

Nagging Doubts about a Student's Safety and Welfare

- Sometimes, things which seem to be significant or trivial at the time, turn out to be vital pieces of information later.
- If there has been no specific incident or information, make a written note. Try to identify what is really making you feel worried.
- Date, time and sign the note. Print your name alongside your signature.
- Pass the note to the designated person. You may keep a copy in a secure place, until the matter is closed.
- Monitor the child. Record observations as factually as possible.

How should notes and reports be made?

It is impossible to say, at the time of making a child protection note, who will eventually have access to it, or when. It may be consulted months or even years after it was written. Always bear in mind that someone who is a complete stranger to you and your school may need to read your record at some stage in the future.

Ideally, logs of incidents should be typed. Hand written notes should be clearly legible and written in ink. The source of the information should be identified eg: "Mrs Bell, a midday supervisor, informed me that ...". Or "I saw John in the playground at break time..." Information should be factual or based on fact. Record what you saw, heard etc. and try not to be vague or woolly (eg: "Jenny was crying and rocking" rather than "Jenny was upset").

Opinion is acceptable provided that you can give some justification for holding it (e.g.: “Sam ran and hid under the table when his mother arrived to take him home, and clung to me when I tried to get him out. He appeared to be frightened.”) Make a note of what you have done with the information (e.g.: “I consulted the Headteacher, Mr Wilson, and he said he would....”).

INFORMATION FOR THE DESIGNATED PERSON

Sharing information with other Schools/agencies

When a student with a child protection file changes school, Chichester Free School will transfer the information to the student’s new school immediately **ensuring secure transit and confirmation of receipt should be obtained.**

Conversations between designated personnel at different schools (eg sharing concerns or asking for information about sibling groups) are perfectly acceptable. **Any** relevant child protection information coming to light should be carefully logged.

Child protection information is confidential and **will not be kept on the student’s school file.** We have a separate, secure filing system for child protection concerns. The filing system is easily available to the designated person. Parents do not have automatic access to the child protection file. Our files are in the Principal’s Study. A note is placed on the cover of the school file for the student, indicating that there is a child protection file relating to the student.

If a child protection file has been started for a student who moves school, the entire contents of the file will be sent to the receiving school/college, **ensuring secure transit and confirmation of receipt should be obtained.** The information will be sent **under separate cover to the ordinary school file**, in a sealed envelope to the Headteacher, marked “Strictly Confidential”.

If a student moves without a forwarding address for home and school and no contact is received from a new school within twenty-one days, the Designated LA Officer for Child Protection will be informed.

What kind of information will be recorded?

If a referral is made to Social Care or the Police, a written note or a completed multi agency referral form will be kept by the school of all the information passed. Copies will be sent to Social Care confirming the referral.

Not all child protection information results in a referral. A record will be made of any information, including hearsay and “nagging doubts”, which give cause for concern about a student, much of this information may not appear to be very significant on its own, but it could contribute to a “jigsaw” picture of abuse that should not be ignored. This information should be passed to the designated teacher so that it can all be kept together.

If a child protection record is started for an individual student, the record will have a front sheet in the file which records the student’s name, date of birth, address and information about family members. (See attached standardised sheet that is being used by Chichester Free School) For example, if John Smith has a sister called Jane Brown, the file will make clear what their relationship is.



It is also good practice to cross-reference files. If any piece of information is lifted from a file for some reason, a card should be placed indicating where the information has gone, and who has it.

If more than one file exists, in relation to an individual child, this is noted on each file. Also, each file should be dated, and indicate the number of volumes e.g.: January 2014, Vol. 1 of 3.

Access to child protection information

Access to the information on file will be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the student and family will be respected as far as possible, but the welfare of the child is paramount.

It would be unlikely that every member of staff needs to know the details of the case. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to know an outline of the case. The school report to the child protection conference should be shared with the parent(s) before the conference takes place. All information must be shared with Social Services and/or Police and Health, as appropriate, where there is concern that a child is at risk of significant harm.

Child protection information will not ordinarily be shared with agencies other than these statutory agencies eg: information should not be released to solicitors etc. Where such a request is made, we will seek the advice of our lawyers.

How long should information be kept?

The Education Authority and Social Care will keep information about the child for many years, so anything reported to Social Care and copied to the LA will still be available. There is no need to keep a copy of material sent to a new school unless, at the discretion of the designated person, there are exceptional reasons for this.

Copies of child protection information will be kept by the school until the student's 24th birthday.

Child protection records can be kept on computer and are in most cases exempt from the disclosure provisions of the 1998 Data Protection Act. For manual records, the Education (School Records) Regulations 2000 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which comes to court, the court may require the school to provide its child protection records.

NB. Please note the guidance on information sharing given in Appendix 14

Auditing Child Protection Files Kept by the School

The Designated Person will ensure, as good practice, that an occasional audit of the school's child protection files is carried out to ensure that adequate records are being kept in the appropriate manner.

The check will cover the following:

- Facing sheet with name, d.o.b., Year and House group
- Note on the child's regular school file.
- File cross-referenced with other family members, if appropriate.
- Records and notes typed or written in legible handwriting.
- Incident date (including year!), time, place.
- Name, and d.o.b. of child(ren) concerned recorded on each sheet.
- Factual outline of incident/concern/allegation/disclosure.
- Opinion substantiated, if given.
- Clear names, job title, if appropriate of staff involved.
- Signature, printed name, job title, if appropriate, of person making record.
- Note of action taken, and with whom information was shared.
- Note of copy sent to Social Care as appropriate.



Contact Details for Designated Person

- Multi Agency Safeguarding Hub (MASH): 01403 229900
- Email: mash@westsussex.gcsx.gov.uk - please include your address and phone number
- Address: Multi Agency Safeguarding Hub
Fourth Floor
County Hall North (Parkside)
Chart Way
Horsham
West Sussex
RH12 1XH
- Out of hours: 0330 222 6664 weekdays between 5.00pm and 8.00am, weekends and bank holidays 24 hours a day
- Think Family and Early Help: <https://www.westsussex.gov.uk/social-care-and-health/social-care-and-health-information-for-professionals/children/think-family/think-family-and-early-help/>



FRONT SHEET: CHILD PROTECTION TRACKING FORM

Child Protection Tracking Form

Name: _____ DOB: _____

Year and House: _____

Date	Concern	Action

Appendix 6

PHYSICAL CONTACT WITH STUDENTS - INFORMATION FOR ALL STAFF

It is unnecessary and unrealistic to suggest that teachers should touch students only in emergencies. Particularly with younger students, touching them is inevitable and can give welcome reassurance to the child. However, teachers must bear in mind that even perfectly innocent actions can sometimes be misconstrued. Students may find being touched uncomfortable or distressing for a variety of reasons. It is important for teachers to be sensitive to a child's reaction to physical contact and to act appropriately. It is also important not to touch students, however casually, in ways or on parts of the body that might be considered indecent.

In extreme cases, which while rare do occur, a teacher might have physically to restrain a student to prevent him or her causing injury to him or herself, to others or to property. In such instances no more than the minimum necessary force should be used and the teacher should seek to avoid causing injury to the student.

SLT and all middle leaders have a responsibility to ensure that professional behaviour applies to relationships between staff and students, that all staff are clear about what constitutes appropriate behaviour and professional boundaries, and that those boundaries are maintained with the sensitive support and supervision required.

Advice on restraint is given in the School Policy on Using Force To Restrain or Control Students. Staff are also advised to refer to the section on the use of force or physical restraint and physical contact in other circumstances in the Code of Conduct for Staff in the Staff Employment Manual.

Further extensive guidance is given in the School's document "Guidance for safe working practice for the protection of students and staff at Chichester Free School" in the Staff Handbook.

Appendix 7

ALERTING THE DESIGNATED PERSON TO POTENTIAL UNWISE PRACTICE

INFORMATION FOR ALL STAFF

(For details of appropriate professional practice refer to the Staff Code of Conduct in the Employment Manual and the document “Guidance for safe working practice for the protection of students and staff at Chichester Free School”).

General Guidance

- Arrange to meet the person raising the concern as soon as practicable. If the concern is about an unsafe/dangerous situation the meeting should be immediate (that very day even if cover has to be requested).
- Suggest an offsite venue if the person raising the concern would like it.
- Take notes – signed and dated by both people. Ask person raising the concern to agree notes.
- Do not judge without proof; the person who is the subject of the allegation has a right to support.
- Agree confidentiality (unless Court Order could overturn or if there are child protection issues).
- Discuss a course of action, with timescales.
- Minor concerns – resolve with the person who is the subject of the allegation.
- Serious issues may need investigation by Police or Child Protection Agency, raise these with Designated Person for Child Protection.
- Inform your own Line Manager as appropriate but Child Protection issues must go straight to Designated Person for Child Protection.

A note should be passed by the Designated Person to the Principal who will decide if it should be placed on the file of the person who is the subject of the concern subject to confidentiality and data protection issues.

Specific Guidance relating to Child Protection Allegations

1. The context in which the alleged incident occurred may provide important information; this includes:
 - 1.1 Normal duties (e.g. teacher disciplining student in whole class; incident away from the whole class scenario; etc.)
 - 1.2 Environment (e.g. special needs group; field trip; etc.)
 - 1.3 Standards applied to member of staff (e.g. role in the school; code of conduct; school training on restraint; etc.)
 - 1.4 Conduct of member of staff (e.g. previous concerns; past disciplinary action; exemplary professional behaviour; etc.)
 - 1.5 Conduct of the student (e.g. characteristic and uncharacteristic behaviour; previous allegations made; etc.)

- 1.6 Special circumstances (e.g. ongoing dispute with family; student's special learning needs or current social needs; etc.)
- 1.7 Perspective of the person making the allegation
2. The most common type of allegation relates to physical abuse. When excessive use of force or an assault is perceived to have occurred, the complainant claims ill treatment by a professional. Any of the following can be regarded as physical assault: punching, kicking, smacking, slapping, shaking or throwing a missile at the student. Teachers do have the right to restrain students, but restraint must not be excessive and must not constitute a punishment. CFS has a policy on using physical restraint, and everyone should be aware that any physical contact could be misinterpreted. Tapping a student on the shoulder to secure attention may not normally be abusive, but if it is done soon after an earlier disagreement, it could be interpreted as assault.
3. Allegations of sexual abuse include (attempted) sexual assault, the possession and use of pornographic material, inappropriate language and behaviour, and inappropriate use of text messaging and other electronic communications. Activities that, although not overtly abusive, could be interpreted as a member of staff "grooming" a child for sexual purposes may need special consideration: e.g. inviting students home, seeing a student socially, offering lifts, etc.
4. Emotional abuse and neglect refers to both acts of commission (e.g. racist remarks, bullying, including sarcasm) and omission (e.g. failing to address homophobic comments or bullying in others, and failure to protect a child from danger on a school trip).
5. A further issue is to consider whether a student is suffering or is likely to suffer significant harm. The age and vulnerability of the student, the degree of force used, the frequency and nature of the harm, and the impact that all of these may have made on the person's health and development, need to be taken into account. Whether the student is at risk may not become clear until the investigation has begun.

A trivial allegation does not have to result in a child protection referral, but the danger is that what may appear to be a trivial incident to a teacher, may be significant to the person involved and may still constitute an assault. It is best therefore to consult further.

6. Only if it can be shown that an allegation is demonstrably false, is it not necessary to make a referral to the Designated Person.

A malicious allegation implies a deliberate act to deceive. Evidence to prove this intention has to be available. An unfounded allegation means that an incident was misinterpreted in some way, and evidence needs to be available to disprove the allegation. As evidence tends only to become available as the result of an investigation, and an investigation cannot be started by the Designated Governor, who would hear the results of such an investigation, a potential false allegation becomes clear at a later stage.

Some allegations may later be considered "unsubstantiated". That is when there is not sufficient evidence; it does not imply either guilt or innocence.

A false allegation could still lead to the decision to make a referral to social services, if a parent agrees that a child is in need of support. It may be that the student has experienced abuse elsewhere or has tried to discredit a member of staff as an act of displacement.

Appendix 8

SUMMARY OF PROCESS FOR ALLEGATIONS AGAINST STAFF

INFORMATION FOR ALL STAFF

1. Allegation made to school

The person hearing an allegation will aim to involve the student in any decision to take the allegation further, taking into account their age, understanding and risk of harm. Confidentiality will not be promised. Such allegations will always be treated seriously even if they are suspected to be mischievous. Details must be recorded in writing, signed and dated by the person who receives the allegation (not the student). The Principal must be informed immediately.

The Designated Governor will always be informed by the Principal of any such allegations unless the allegation is about the Designated Governor in which case it should be reported to another nominated Governor. If the allegation is about the Principal then the Nominated Person for Child Protection, or the Deputy Nominated Person for Child Protection, if the Nominated person is also the Principal, will inform the Designated Governor.

If the allegation meets any of the following criteria the Principal should report it to the LA designated officer, or the designated officer team the same day:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child in a way that indicates s/he is unsuitable to work with children

The Principal will take advice from the LA designated officer, or designated officer team and will consider whether the suspension of the member of staff would be appropriate. This will not be automatic.

The duties and rights of governing bodies and head teachers are currently set out in the subsequent documents and will be followed:

- Education Act 1996
- Employment Rights Act 1996
- School Standards and Framework Act 1998
- School Teachers Pay and Conditions Document 1999
- Education Act 2002 (s.157 / 175)
- Guidance on dealing with allegations of abuse against teachers and other staff 2005
- Keeping Children Safe in Education September 2016
- Working Together to Safeguard Children Update Feb 2017

2. Supporting those involved

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. They should be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution. That includes the outcome of any disciplinary process. NB. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome.

- a) In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care, or the police as appropriate, should consider what support the child or children involved may need.
- b) The School will also keep the person who is the subject of the allegations informed of the progress of the case and consider what other support is appropriate for the individual. If the person is suspended, the school will also keep the individual informed about developments at school. If the person is a member of a union or professional association s/he will be advised to contact that body at the outset.

3. Confidentiality

Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated/considered. In accordance with the Association of Chief Police Officers (ACPO) guidance the police will not normally provide any information to the Press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police might depart from that rule, e.g. an appeal to trace a suspect, the reasons should be documented and partner agencies consulted beforehand.) The system of self-regulation, overseen by the Press Complaints Commission, also provides safeguards against the publication of inaccurate or misleading information.

4. Resignations and "Settlement agreements"

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children including any in which the person concerned refuses to cooperate with the process. Wherever possible the person should be given a full opportunity to answer the allegation and make representations about it, but the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be regarded as substantiated on the basis of all the information available should continue even if that cannot be done or the person does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

By the same token so called "settlement agreements" by which a person agrees to resign, the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used

in any future reference, must not be used in these cases. In any event, such an agreement will not prevent a thorough police investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the DBS where circumstances require that.

5. **Record Keeping**

It is important that a clear and comprehensive summary of any investigations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personal file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

6. **Allegation made to the Police**

If an allegation is made to the police, the officer who receives it should report it to the force designated liaison officer without delay and the designated liaison officer should inform Children's Social Care straight away.

7. **Initial consideration**

1. Social Care will discuss the matter with the Principal and where necessary obtain further details of the allegation and the circumstances in which it was made. The Principal will not investigate the allegation at this stage. The discussion will also consider whether there is evidence/information that establishes that the allegation is false or unfounded.
2. If the allegation is not patently false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, Social Care will ask for a strategy discussion in accordance with "Working Together" to be convened straight away. In those circumstances the strategy discussion should include the Principal.
3. If there is not cause to suspect that "significant harm" is an issue, but a criminal offence might have been committed, Social Care should immediately inform the police and convene a similar discussion to decide whether a police investigation is needed. That discussion should also involve the school and any other agencies involved with the child.

8. **Action following initial consideration**

Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the Principal to deal with it. In such cases, if the nature of the allegation does not require formal disciplinary action, the Principal will institute appropriate action **within 3 working days**. If a disciplinary hearing is required and can be held without further investigation, the hearing will be held **within 15 working days**.

Suspension

The possible risk of harm to children posed by an accused person needs to be effectively evaluated and managed – in respect of the child(ren) involved in the allegations, and any other children in the individual's home, work or community life. In some cases that will require the School to consider suspending the person until the case is resolved. Suspension will be considered in any case where there is cause to suspect a child is at risk of significant harm, or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal. However, a person must not be suspended automatically, or without careful thought. The School will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children until the allegation is resolved, and may wish to seek advice from an ASCL adviser. The School will also consider whether the result that would be achieved by suspension could be obtained by alternative arrangements.

Where further investigation is required to inform consideration of disciplinary action the Principal and the nominated governor will discuss who will undertake that with the LA designated officer. In some settings and circumstances it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of the school. In any case the investigating officer should aim to provide a report to the Principal **within 10 working days**.

On receipt of the report of the disciplinary investigation, the Principal will consult the LA Designated Officer, or Designated Officer Team and decide whether a disciplinary hearing is needed **within 2 working days**. If a hearing is needed it should be held **within 15 working days**.

In any case in which children's social care has undertaken enquiries to determine whether the child or children are in need of protection, the Principal and nominated governor should take account of any relevant information obtained in the course of those enquiries when considering disciplinary action.

The LA Designated Officer should continue to liaise with the School to monitor progress of the case and provide advice/support when required/requested.

9. Case subject to police investigation

If a criminal investigation is required, the police will aim to complete their enquiries as quickly as possible consistent with a fair and thorough investigation and will keep the progress of the case under review. They should at the outset set a target date for reviewing progress of the investigation and consulting the CPS about whether to proceed with the investigation, charge the individual with an offence, or close the case. Wherever possible that review should take place **no later than 4 weeks** after the initial action meeting and if the decision is to continue to investigate the allegation dates for subsequent review should be set at that point. (It is open to the police to consult the CPS about the evidence that will need to be obtained in order to charge a person with an offence at any stage).

If the police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a Court, the police should wherever possible aim to pass all information they have which may be relevant to a disciplinary case to the Principal

within 3 working days of the decision. In those circumstances the Principal and the LA designated officer should proceed as described above. NB: In any case in which children's social care has undertaken enquiries to determine whether the child or children are in need of protection, any information obtained in the course of those enquiries which is relevant to a disciplinary case should also be passed to the School.

If the person is convicted of an offence the police should also inform the employer straight away so that appropriate action can be taken.

10. Specified Outcomes

After any allegations of abuse have been made, there are a range of specified outcomes:

- substantiated,
- malicious
- false
- unsubstantiated.
- unfounded

all of which are discussed in '*Keeping Children Safe in Education 2016*', which has introduced the latter 'unfounded' outcome:

Schools may wish to use the additional definition of 'unfounded' to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances.

11. Referral to the Disclosure and Barring Service

If on conclusion of the case the School ceases to use the person's services, or the person ceases to provide his/her services, the School should consult Children's Social Care about whether a referral to DBS is required. If a referral is appropriate the reports should be made as soon as possible, and certainly within one month. It is a legal requirement to report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children.

Details of the referral process and the form for referral is available on the DBS referrals website at:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

The address for referrals is PO Box 181, Darlington DL1 9FA (Tel.01325 953795.)

Appendix 9

INFORMATION FOR THE DESIGNATED PERSON - CONSIDERATIONS WHEN ASSESSING REFERRALS FOLLOWING ALLEGATION OF UNDERAGE SEXUAL ACTIVITY

The considerations in the following checklists should be taken into account when assessing the extent to which a child (or other children) may be suffering or at risk of harm following allegations of harm resulting from underage sexual activity, and therefore the need to hold a strategy discussion in order to share information:

- the age of the child. Sexual activity at a young age is a very strong indicator that there are risks to the welfare of the child (whether boy or girl) and, possibly others;
- the level of maturity and understanding of the child;
- what is known about the child's living circumstances or background;
- age imbalance, in particular, where there is significant age difference, this includes age imbalances where both partners are under the age of 16;
- overt aggression or power imbalance;
- coercion or bribery;
- familial child sex offences;
- behaviour of the child i.e. withdrawn, anxious;
- the misuse of substances as a disinhibitor;
- whether the child's own behaviour, because of the misuse of substances, place him/her at risk of harm so that he/she is unable to make an informed choice about any activity;
- whether any attempts to secure secrecy have been made by the sexual partner, beyond what would be considered usual in a teenage relationship;
- whether the child denies, minimizes or accepts concerns;
- whether the methods used are consistent with grooming; and
- whether the sexual partner/s is known by one of the agencies.

Appendix 10

INFORMATION FOR THE DESIGNATED PERSON

NB. Electronic version of referral form to be found here: Updated Feb 2016

<http://www.westsussexscb.org.uk/professionals/contacts-for-referral/>

Request for Support Form (Professionals)

Information supplied will be shared with other professionals supporting families to provide relevant services. Where families request support, parental consent should be gained (or young person consent where appropriate.) **In the case of a Child Protection concern or professional worry, no consent for referral is required.**

Please complete this form as thoroughly as possible. Please include copies of any relevant assessments or additional information that will help in identifying the right level of support for the family / young person.

Please send completed referral to MASH@westsussex.gcsx.gov.uk		Date of Referral?					
Are there immediate safeguarding concerns?		Yes/No					
Are the parent/s/carers / aware of this referral?		Yes/No					
Have the parent/s/carers / given consent for this referral and for us to share their information with other agencies?		Yes/No					
Does the child or young person know about this referral? If so what do they think about it? If not what do you think they might feel about it?		Yes/No					
Your name and agency/relationship to family: Address, contact number and email:							
Family Name(s) / Young Person's Name:		EDD/DOB:					
Alternative Surname(s):		FWI:					
Family Address (inc. postcode):		Holistix:					
		NHS number:					
		Religion:					
		First language: Interpreter needed y <input type="checkbox"/> n <input type="checkbox"/>					
Home telephone number:		Immigration Status:					
Mobile – Carer / Young Person:		Other:					
Email address:							
Does the Young Person have a Caring Role? y <input type="checkbox"/> n <input type="checkbox"/>							
Household details – all those living in the family home (unless referral for Young Person only)							
<i>Full Name</i>	DOB	Age	Gender	Family Member (Mum, Dad, Child, Nan etc)	Ethnicity	Disabilities / long term health conditions:	Education setting



Significant others: Details of other family/friend networks (not living in the family home)							
Full name	DOB	Relationship to family			Contact details		

GP Details:
Name and Surgery:
Risk Factors:
<p>Are there any known risk factors / safety issues (e.g. family member that poses risk to professionals or themselves, dangerous animals, community issues etc?) Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes please provide further information:</p>
<p>Signs Of Safety – please be as detailed and clear as possible when completing this section as this will help us decide what level of support is needed (i.e. Joe Bloggs is displaying aggressive behaviour at home – What does this look like? How frequent is this? How long has it been going on? Why does this worry you? How does this impact on the child/young person/family?)</p>
<p>What are you worried about / Reasons for referral? (risks and complicating factors, and harm past and present i.e. safeguarding concerns, inappropriate caring role, CSE concerns, substance misuse, young person’s emotional wellbeing or functioning (e.g. Low mood / self-esteem, self-harm, suicidal ideation, education, anxiety, taking medication))</p>
<p>What’s going well? (family strengths and proven ability to keep safe from harm/meet needs)</p>
<p>What needs to happen next / change in order to support the family / young person? (i.e. Safety planning, any specific service recommendations for the family)</p>



Child / Young person / Parent comments	
Signature	Cc'd to

Please send completed referral to MASH@westsussex.gcsx.gov.uk



Appendix 11

CHICHESTER FREE SCHOOL
Pre-Employment Disclosure Risk Assessment Form

Please ensure that all details recorded on this form are accurate and that the form is signed.

This form **MUST** be completed by the Principal where newly recruited staff or volunteers, who require Disclosure & Barring Service clearance, commence their duties before DBS clearance is received (*)

* Scanned or email copies will only be accepted if they have been signed by both parties.

Name of Candidate:		Post Title:	
EYFS or KS:		Workplace:	
		Start Date Proposed:	

Please describe the nature of the work and the general duties of the job role? (Please also include amount of contact with vulnerable parties, frequency of contact and intensity of contact).		
Please describe below the arrangements in place for supervision whilst waiting for DBS clearance. (supervision is required & if this cannot be accommodated, the start date must be delayed until DBS clearance has been received).		
Will the position involve working with:-		
Children	Vulnerable Adults	Both
Have 2 satisfactory references been received? (2 satisfactory references must be received in order for a DBS risk assessment to be considered)		
Has the individual submitted a completed DBS Application Form with relevant identification? (This is a requirement in order for the DBS risk assessment to be considered)		
What additional safeguard arrangements will be put in place (if any) whilst waiting for DBS clearance to be received?		
Has the individual declared any convictions/cautions/reprimands/warnings? Circle Yes or No.		



(Please note that the DBS Disclosure will record all spent and unspent information regardless of how long ago they occurred)

Yes

No

If so, are the offences relevant to the post and the proposed contact with the vulnerable parties?

Is there a pattern of convictions?

How long ago did the offences occur?

Have the individual's circumstances changed? (If so, please explain)

Following the Risk Assessment, is this individual suitable to commence employment? (Overall assessment and comment required – Low/Med/High Risk)

Risk Assessment conducted: _____ Signature

(Appointing SLT/Officer/Principal):

Date: _____

Signed New Appointee: _____

Date: _____

Appendix 12

GUIDANCE ON CHILDREN STAYING WITH HOST FAMILIES AND PRIVATE FOSTERING

Schools and colleges quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both. The following paragraphs are not intended to be a comprehensive guide to all the circumstances in which private fostering may arise, but only to those situations which might arise for schools and colleges through the normal course of their activities in promoting learning activities for children.

Where the child is under the age of 18 and the person who provides the care and accommodation is paid to provide that arrangement, or the arrangement is not made by the child’s family, the private fostering arrangement could amount to regulated activity for the purposes of the Safeguarding Vulnerable Groups Act 2006 regardless of the duration of the arrangement.⁵⁰ If the school or college is responsible for making the arrangement, and has the power to terminate the arrangement, then it could be the regulated activity provider. If the arrangement is made by a third party, such as a language school, and that third party has the power to terminate the arrangement, then the third party is the regulated activity provider. A regulated activity provider will be committing an offence if they knowingly allow a person to carry out a regulated activity whilst barred.

Where the school or college is the regulated activity provider, it should request a DBS Certificate with barred list check.. Where schools and colleges have not been involved in making the arrangement but a member of staff or volunteer at a school or college becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person’s home, they should raise this in the first instance with the designated senior person for child protection. The school or college should notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child.

A person who is barred from regulated activity will themselves be committing an offence under the Children Act 1989 and under the Safeguarding Vulnerable Groups Act 2006 if they privately foster a child. If the school or college has any reason to believe that the third party is failing to undertake a statutory duty they should notify the police.

Schools and colleges arranging for their children to stay with families overseas should be aware that the DBS cannot access criminal records held overseas. Host families in other countries, therefore, cannot be checked in the same way by local authorities as schools and colleges in this country when children stay abroad. Schools and colleges should work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit. If they wish, local authorities and schools can contact the relevant foreign embassy or High Commission of the country in question and find out if similar checks can be done in that country.

Appendix 13

FEMALE GENITAL MUTILATION

Female Genital Mutilation is a form of child abuse and as such is dealt with under the schools Child Protection policy. At Chichester Free School, the Principal and Governors expect Safeguarding to be everybody's responsibility expect all staff to adhere to and follow this policy. The school uses the World Health Organisation definition as written below.

Definition of FGM:

“Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.”

(World Health Organisation-1997)

Government documents:

The school has taken information from several documents to write this appendix. These include, *Keeping Children Safe in Education (2016)*, The South West Child Protection Procedures Guidelines for FGM <https://www.proceduresonline.com/swcpp/>, the Government Home Office guidelines, the *Ofsted* guidelines for “Inspecting Safeguarding”.

Keeping Children Safe in Education (2016):

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

The UK Government has written advice and guidance on FGM that states;

“FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child.”

“Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM.

UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.”

Key questions for all staff:

- Are all staff in the school are aware of the potential risks?
- How alert are staff to the possible signs that a child has been subject to female genital mutilation or is at risk of being abused through it?
- Has the school taken timely and appropriate action in respect of concerns about particular children?

In order to protect our children it is important that key information is known by all of the school community.

Indications that FGM has taken place:

- Prolonged absence from school with noticeable behaviour change – especially after a return from holiday.
- Spend long periods of time away from the class during the day.
- A child who has undergone FGM should be seen as a child protection issue. Medical assessment and therapeutic services to be considered at the Strategy Meeting.

Indications that a child is at risk of FGM:

- The family comes from a community that is known to practice FGM - especially if there are elderly women present.
- In conversation a child may talk about FGM.
- A child may express anxiety about a special ceremony.
- The child may talk or have anxieties about forthcoming holidays to their country of origin.
- Parent/Guardian requests permission for authorised absence for overseas travel or you are aware that absence is required for vaccinations.
- If a woman has already undergone FGM – and it comes to the attention of any professional, consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended family members and a referral made to Social Care or the Police if appropriate.

If we have concerns that children in our school community are at risk or victims of Female Genital Mutilation then we can refer to the swcpp Guidelines for FGM (<https://www.proceduresonline.com/swcpp/>). We may;

ASK

Ask children to tell you about their holiday. Sensitively and informally ask the family about their planned extended holiday ask questions like;

- Who is going on the holiday with the child?
- How long they plan to go for and is there a special celebration planned?

- Where are they going?
- Are they aware that the school cannot keep their child on roll if they are away for a long period?
- Are they aware that FGM including Sunna is illegal in the U.K even if performed abroad?

If you suspect that a child is a victim of FGM you may ask the child;

- Your family is originally from a country where girls or women are circumcised – Do you think you have gone through this?
- Has anything been done to you down there or on your bottom?
- Do you want to talk to someone who will understand you better?
- Would you like support in contacting other agencies for support, help or advice?

These questions and advice are guidance and each case should be dealt with sensitively and considered individually and independently. Using this guidance is at the discretion of the Principal.

Record

All interventions should be accurately recorded.

Refer

Designated person for Child protection needs to seek advice about making referrals to LADO, Social Care and CAIT (Child Abuse Investigation Team).

NB. Teachers must personally report to the police a disclosure that FGM has been carried out (in addition to liaising with the Designated Person)

Useful documents include:

- *Multi-Agency Practice Guidelines: Female Genital Mutilation* (HM Government, 2011)
- South West Child Protection Procedure Guidelines
- *Keeping Children Safe in Education (2016, para 27 and Annex A)*
- The Department for Education website:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf.

Appendix 14

Information Sharing

Seven golden rules to sharing information

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 15

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Filters and monitoring

CFS does all we reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, we ensure there are appropriate filters and monitoring systems in place.

We take responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, and therefore consider the age range of our pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The UK Safer Internet Centre has published guidance as to what "appropriate" might look like:

- UK Safer Internet Centre: appropriate filtering and monitoring Guidance on e-security is available from the National Education Network

Whilst filtering and monitoring are an important part of the online safety picture for CFS to consider, it is only one part. We also take a whole school approach to online safety. This includes a clear policy Esafety and focus on educating about the risks of use of the internet, social media and digital footprint, along with other safety risks. There is an esafety committee, formed of students, which helps to reflect on and advise about new risks.

Whilst it is essential that we ensure that appropriate filters and monitoring systems are in place, we are careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Staff training

CFS ensures that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, (including online), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.



Information and support

There is a wealth of information available to support schools to keep children safe online. The following is not exhaustive but should provide a useful starting point:

www.thinkuknow.co.uk

www.disrespectnobody.co.uk

www.saferinternet.org.uk

www.internetmatters.org

www.childnet.com/cyberbullying-guidance

www.pshe-association.org.uk

educateagainsthate.com

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Appendix 16

‘Honour Based Violence’ and Forced Marriage

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Actions

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see FGM appendix).

Forced Marriage

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

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Appendix 17

Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of CFS' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme. Prevent.

From 1 July 2015, specified authorities, including all schools (and, since 18 September 2015, all colleges) as defined in the summary of this guidance, are subject to a 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". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales are specifically concerned with schools (but also cover childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. It is not necessary for schools to have distinct policies on implementing the Prevent duty.

- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in

line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. CFS will assess the training needs of staff in the light of our assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, CFS ensures that the designated person for Child Protection undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- CFS ensures that children are safe from terrorist and extremist material when accessing the internet in schools. The department has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

The Government has launched [educate against hate](#), a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

Channel

School and college staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at: [Channel guidance](#). An elearning channel awareness programme for staff is available at: [Channel General Awareness](#). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism and, where considered appropriate and the necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges that are required to have regard to Keeping children safe in education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

Appendix 18

Children Missing Education

The Statutory Guidance *Children Missing Education (September 2016)*. Outlines the following key responsibilities which we must follow at CFS. More information can be found in the statutory document.

- Schools must enter pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the school should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.
- Schools must monitor pupils' attendance through their daily register. Schools should agree with their local authority the intervals at which they will inform local authorities of the details of pupils who fail to attend regularly, or have missed ten school days or more without permission.
- Schools should monitor attendance closely and address poor or irregular attendance. It is important that pupils' poor attendance is referred to the local authority.
- Where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.
- Schools must also arrange full-time education for excluded pupils from the sixth school day of a fixed period exclusion. This information can be found in the Exclusion from maintained schools, academies and pupil referral units in England statutory guidance.
- Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences.

New requirements as of September 2016 are:

- All schools must notify their local authority when they are about to remove a pupil's name from the school admission register under any of the fifteen grounds listed in the regulations (see Annex A of *Children Missing Education (September 2016)*). This duty does not apply when a pupil's name is removed from the admission register at standard transition points – when the pupil has completed the final year of education normally provided by that school – unless the local authority requests that such returns are to be made.
- When removing a pupil's name, the notification to the local authority must include: (a) the full name of the pupil, (b) the full name and address of any parent with whom the pupil normally resides, (c) at least one telephone number of the parent, (d) the pupil's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the pupil's name is to be removed from the admission register (see Annex A).
- Schools must make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register if the deletion is under regulation 8(1), sub-paragraphs (f)(iii) and (h)(iii) (see Annex A).
- All schools must also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point. The notification must include all the details contained in the admission register for the new pupil. This duty does not apply when a pupil's name is entered in the admission register at a standard transition point – at the start of the first



year of education normally provided by that school – unless the local authority requests that such returns are to be made.

- When adding a pupil's name, the notification to the local authority must include all the details contained in the admission register for the new pupil.

Appendix 19

Sexting and Youth Produced Sexual Imagery

Sexting is difficult to define, but can cause harm to all those involved. Where it occurs then all staff at CFS have a duty to refer it on to a line manager or the designated people for child protection as it is potentially a safeguarding matter. This will follow the normal process for raising concerns.

UKCCIS have offered the following definition of Sexting, or what they prefer to call Youth Produced Sexual Imagery in their advice document *Sexting in Schools and Colleges: Responding to incidents and safeguarding young people*:

Whilst professionals refer to the issue as ‘sexting’ there is no clear definition of ‘sexting’. Many professionals consider sexting to be ‘sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.’ Yet when young people are asked ‘What does sexting mean to you?’ they are more likely to interpret sexting as ‘writing and sharing explicit messages with people they know’. Similarly, many parents think of sexting as flirty or sexual text messages rather than images.

UKCCIS advice only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management.

On this basis UKCCIS advice introduces the phrase ‘youth produced sexual imagery’ and uses this instead of ‘sexting.’ This is to ensure clarity about the issues this advice addresses. ‘Youth produced sexual imagery’ best describes the practice because:

- ‘Youth produced’ includes young people sharing images that they, or another young person, have created of themselves.
- ‘Sexual’ is clearer than ‘indecent.’ A judgement of whether something is ‘decent’ is both a value judgement and dependent on context
- ‘Imagery’ covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document)

The types of incidents which UKCCIS advice covers are:

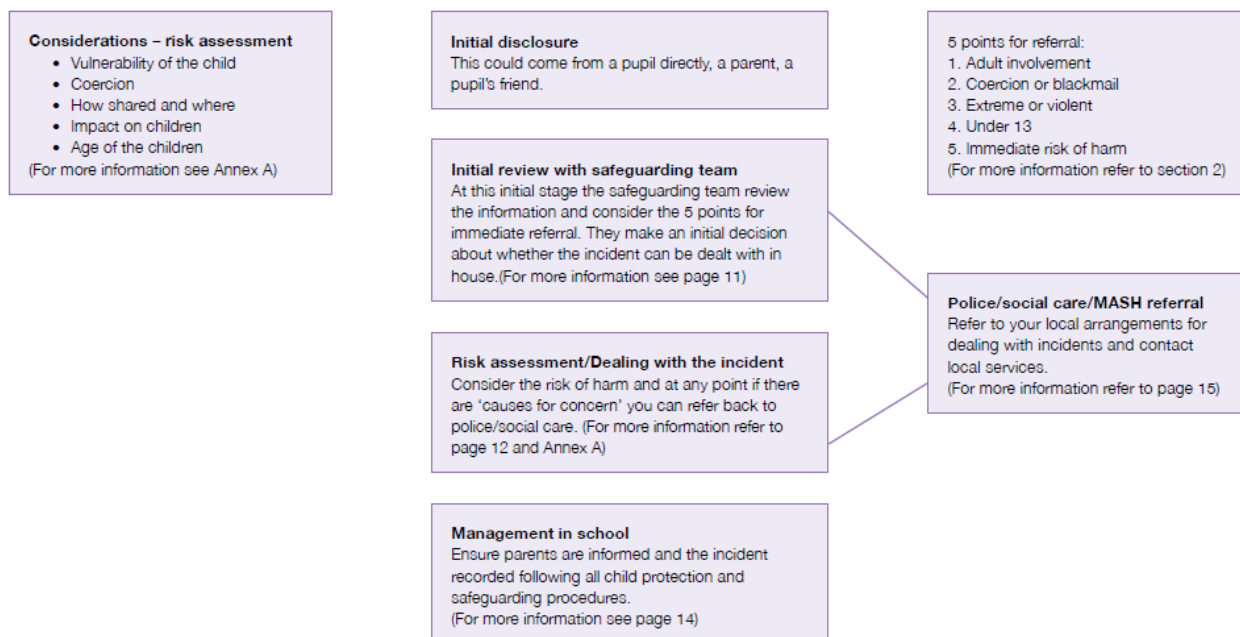
- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

UKCCIS advice does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don’t contain imagery.

Below is a helpful flowchart to be used when dealing with any incident of youth produced sexual imagery:

Flowchart for responding to incidents



Appendix 20

AGENCY REPORTING FORM FOR ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH CHILDREN WITHIN WEST SUSSEX

WHEN AND HOW TO USE THIS FORM

This form must be filled in and sent to the Local Authority Designated Officer (LADO) in West in every case where it is *alleged* that a person working/volunteering with children has

1. behaved in a way that has *harmed* or may have harmed a child
2. possibly committed a *criminal offence* against or related to a child
3. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children or in the case of teachers behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children, is unsuitable to work with children.

This form should be used when an allegation has been made about a worker regarding their formal role with children or when there has been an allegation made in their private life.

You may be asked to provide associated relevant documentation with this referral form. Once the information has been evaluated by the LADO you will be advised re the appropriate action to be taken.

You may find it helpful to read the Allegations Managements Procedures for Sussex before completing this referral. These can be found at:

http://pansussexscb.proceduresonline.com/chapters/p_alleg_ppl_wk_ch.html

Referring Agency Details

Date of referral	
Referrers name	
Referrers job title	
Place of work & address	
Tel number	
Email	
Who is your Designated Manager/Child Protection Lead	
Status of organisation eg LA, private, voluntary etc	
Who is your HR lead for allegations against staff	

Allegation Details

Is this a work or private life matter	
Date of alleged incident	
Date allegation reported to referrer	

Category of Abuse Alleged – please tick	Physical	Emotional	Sexual	Neglect
Who else has been informed regarding allegation				
Full details of allegation e.g. what action has been taken, injuries, medical treatment given, context, witnesses etc.				
Are written incident reports available and if so by whom				
Are the parents/carers of the child aware of the allegation and if so please state when and their views				
Is the child aware of referral and if so when/ their views				
Did an allegation of physical harm follow a restraint?	Yes	No		
If allegation relates to restraint has staff member had team teach or similar training and when				

Details of person/s subject to the allegation pl repeat box if more than one person

Person subject to allegation	
Job title	
DOB	
Home address	
Ethnicity/religion	
Length of employment	
If they are an agency worker please give contact details for the agency	
Have they been subject to previous allegations and if so provide full details	
Are there any other concerns/issues of relevance re this person	
Does this person work in	

any other capacity with children either paid/unpaid, if so please give details?	
Does this person have children of their own?, if so please give details	
Has the person been suspended/advice taken from HR	

Details of potential victim/child pl repeat box if more than one child

Name	
DOB	
Gender	
Ethnicity/Religion	
Home address/tel	
Parent's/carers names/contact details	
Who has PR for the child	
First language of child and parents/carers – is an interpreter required	
Issues of disability/communication/literacy for child or parent/carer	
Has the child made a previous allegation and if so give details	
Is/has this child been a child who is looked after or a child protection plan	
Are there other professionals working with this child eg social worker/SEN input etc and pls state. If a child looked after please also provide the independent review officer details	
Other information of relevance re this child and the allegation	

Please give details of any other information of relevance

Please return this form to:

Lindsey Tunbridge-Adams and Anne Richards

Telephone: 0330 222 3339

Email: lindsey.tunbridge-adams@westsussex.gov.uk anne.richards@westsussex.gov.uk

Data security: when emailing this form please ensure it is sent safely, using password protection if needed.

Next Steps

The Local Authority Designated Officer (LADO) is responsible for the oversight and management of allegations made against employees.

The LADO will evaluate the information provided on this form to determine whether the allegation meets the Allegations Management Thresholds. This may involve consulting with relevant statutory agencies such as the police, Children's Social Care and Ofsted.

The employer must not commence an internal investigation before the LADO has responded to the referral. It is the responsibility of the Police and the Children's Services to investigate allegations of abuse involving children. Any such intervention at this stage could jeopardise a potential criminal investigation. The employer may make basic enquiries to determine whether there may be some potential foundation to the allegation. The enquiries should be minimal to establish the facts of the allegation, if these were not established or were unclear at the time of the concern being raised.

Please note: When the next steps have been agreed and you speak with the staff member you must inform them that WSCC LADO department will be keeping a record of this case. You must also follow your organisation's procedures for informing your regulatory and professional bodies.