



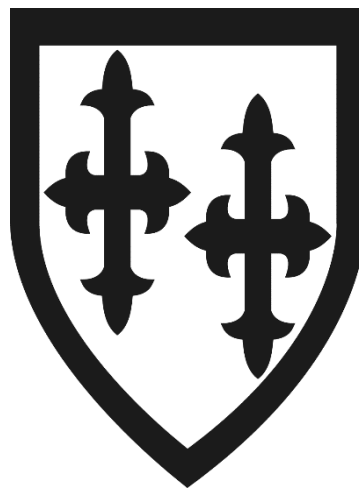
Twycross House School

# **Child Protection & Safeguarding Policy**

**Twycross House School**

## **CHILD PROTECTION AND SAFEGUARDING POLICY**

**September 2023**





## Twycross House School

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### Named staff and contacts

#### **Designated Safeguarding Leads:**

Lead DSL: Mr Luke Knight,

Deputy DSLs: Mrs Charlotte Lauder and Mrs Caroline Paul, Miss Helen Martin, Mrs Rowan Williams-Gould, Mr Dan Westaway.

**Well-being Officer – Themis Avaraki**

#### **Leicestershire County Council Contacts:**

##### **First Response Children's Duty 24/7**

Telephone Referrals – concerns requiring a same day response

Telephone 0116 3050005 (including out of hours ser **Issue: March 2023**)

##### **Online Referral Forms (Social Care and 'Request for Services' forms)**

<https://resources.leicestershire.gov.uk/MARF>

[childrensduty@leics.gov.uk](mailto:childrensduty@leics.gov.uk)

**First Response Professionals Consultation Line** 0116 3055500

For complex case advice (9.30am-11am, 12.30pm-3.30pm)

##### **CCE/CSE Consultation Line**

0116 305 9521

[CSE.duty.team@leics.gov.uk](mailto:CSE.duty.team@leics.gov.uk)

<https://lrsb.org.uk/criminal-exploitation-screening>

- CE RA tool

<https://lrsb.org.uk/cse-risk-assessment-tool-and-ref>

- CSE RA tool

##### **Early Help queries and consultation line**

0116 305 8727

Email: [earlyhelpreferrals@leics.gov.uk](mailto:earlyhelpreferrals@leics.gov.uk)

##### **First Response - Service Managers**

Joanne Searle [joanne.searle@leics.gov.uk](mailto:joanne.searle@leics.gov.uk)

0116 3053909

Adam Tyler [adam.tyler@leics.gov.uk](mailto:adam.tyler@leics.gov.uk)

0116 3058351

##### **Allegations Manager/LADO**

Kim Taylor / Lovona Brown / Shellie Miskella

0116 305 4141

[cfs-lado@leics.gov.uk](mailto:cfs-lado@leics.gov.uk)

##### **Safeguarding Development Officers – these posts are currently vacant.**

In the interim, please contact Education Effectiveness on: 0116 3053365

Email: [educationeffectiveness@leics.gov.uk](mailto:educationeffectiveness@leics.gov.uk)

##### **CHANNEL referral (extremism/radicalisation)**

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Prevent Engagement Team [prevent.team@leicestershire.pnn.police.uk](mailto:prevent.team@leicestershire.pnn.police.uk)

##### **CAIU Referral Desk – direct line**

0116 2485 500

##### **Operation Encompass Helpline (psychologist)**

02045139990 (8am-1pm)

##### **FREEVA (Free from violence and abuse)**

0808 802 0028

##### **LLR Children & Young People's Mental & Emotional Health Triage & Navigation Service**



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This service will offer one point of referral for mental and emotional health concerns thereby simplifying the process. This will not be for urgent or emergency referrals. Schools will be able to use this referral system. All referrals will be triaged and referred on – possible to online counselling, Early Intervention Services, Early Help, CAMHS and the voluntary sector.



# Twycross House School

## Introduction

At Twycross House School (THS) the safeguarding and welfare, both physical and mental, of the children is of prime importance and is the responsibility of the school and every adult working in it. This document aims to show how the school intends to discharge its statutory duties and pastoral responsibilities toward children and its duty of care toward all members of the school community. We encourage all students to talk about their worries and to report their concerns to us in a number of alternative ways. The pupils' welfare is of paramount importance.

This policy is consistent with:

- the legal duty to safeguard and promote the welfare of children as described by section 157 of the Education Act 2002 for independent schools and academies, 'Keeping Children Safe in Education – Statutory guidance for schools and colleges' September 2023 and 'Working Together to Safeguard Children' (July 2018).
- the Leicestershire and Rutland Safeguarding Children Partnership - Multi-Agency Safeguarding Arrangements
- The Prevent Duty and the Leicestershire and Rutland Safeguarding Children Partnership (LRSCP) procedures.

These are the main elements of our policy:

- **Prevention** (e.g. positive school atmosphere, teaching and pastoral support to pupils, safer recruitment procedures);
- **Protection** (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns);
- **Support** (to pupils and school staff and to children who may have been abused);
- **Working with parents** (to ensure appropriate communications and actions are undertaken).

This policy applies to all staff and visitors to the school. We recognise that child protection is the responsibility of all adults in school. We will ensure that all parents and other working partners are aware of our child protection policy by mentioning it in our school prospectus, displaying appropriate information within school and on the school website and by raising awareness at meetings with parents.

Child Safeguarding comprises the broad measures put in place to keep children safe, while Child Protection comprises more specific measures to protect children who have been harmed or are at risk of harm.



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### **Extended school and 'Out of School' activities**

Where the School provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the Headmaster and Lead DSL will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children (inspecting these where needed) and that there are arrangements to liaise with the school on these matters where appropriate. Safeguarding requirements will be included in any lease or hire agreement as a condition of use; and any failure to comply will lead to termination of the agreement.

### **Schools Commitment to Safeguarding**

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

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

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

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

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

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

The school adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. Staff encourage children and parents to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

#### **The school undertakes to:**

- Establish and maintain an ethos where all children (including those having protected characteristics under the Equalities Act 2010) feel secure and are encouraged to report concerns, talk, and are listened to;



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- Ensure that children's wishes and feelings are taken into account when determining what actions to take and services to provide and that they are able to express their views and give feedback. We will always seek to act in the best interests of children.
- Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty and that there are alternative ways to report concerns;
- operate safe adult recruitment procedures, including Disclosure & Barring Service (formerly CRB) checks and compliance with Independent Schools Standard Regulations and KCSE September 2023 (see Safe Recruitment Policy)
- have in place 3 senior members of staff with designated responsibilities for child safeguarding and welfare issues and for liaison with the local authority and Local Safeguarding Children Board; who has received appropriate training in child protection and inter-agency working (updated every two years) and whose name and role is known to every member of staff, including temporary and supply staff and volunteers. This is currently the Head of Lower School, Mr Luke Knight, Head of Sixth Form, Mrs Charlotte Lauder and Mrs Caroline Paul.
- If they are unavailable, the designated member of staff at The Hollies, will step in for them. (Mrs P Bryan, Mrs S Downes).
- publish the school's Child Safeguarding Policy annually to individual staff members.
- ensure that parents understand the school's responsibility for child safeguarding by publishing this policy on the school's website and providing a paper copy on request
- provide training in child safeguarding (updated every three years) for teachers and all teaching and ancillary staff, ensuring that part-time and voluntary staff who work with children are made aware of the arrangements, including the school's Behaviour policy and what to do if children go missing. To have regular safeguarding updates at least termly and whenever the necessity arises. (please see Staff Meeting records)
- KCSE Sept 2023 part I and Annex A is provided to all those working directly with children in school and will be reviewed annually.
- Provide induction training for child protection for new members of staff. KCSE Sept 2023 part I and Annex A will be used as part of this induction plus the school's safeguarding, code of conduct and behaviour policies. Records will be kept of when this training takes place.
- ensure that all staff, including new staff and volunteers, understand that they must be alert to the signs of abuse, refer any concerns to the designated member of staff (Mr Knight/Mrs Lauder/Miss Martin/Mrs Paul/Mr Westaway) and fully understand how to deal with the disclosure of sensitive information by a child.
- ensure that all staff are aware that although the DSL/DDSL's will usually decide whether to make a referral to children's social care, any staff member can refer their concerns to children's social care directly.
- If a child's situation does not appear to be improving, the staff member who has concerns should press for reconsideration.
- If at any point there is a serious and immediate risk of harm to a child, a referral to children's social care MUST be made immediately ANYONE can make a referral. The First Response Children's Duty Team should be contacted by phone.



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- advise staff on appropriate ways of keeping pupils safe and avoiding actions which might lead to allegations that they were at risk of harm.
- **Whistle blowing** - all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children. Staff will follow agreed procedure where there is an allegation made against, a member of staff or another child – this will usually be undertaken by the Head **but any staff member can refer their concerns directly to children's social care if there is a risk of immediate serious harm.** **NSPCC Whistle blowing helpline 0800 028 0285**
- keep written records of concerns about children, even where there is no immediate referral, and securely store these away from the main pupil file.
- ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies
- notify children's social care services if a pupil on a child protection plan is absent for more than two days without explanation.
- ensure that when a pupil on a child protection plan leaves the school, his/her information is transferred at once by the DSL/DDSLs and signed for at the new school and the child's social worker is informed. This will be in advance of the child arriving where specific ongoing support is required. This will take no longer than 5 days.
- understand the pressures on a child who has witnessed or suffered abuse and do everything possible to support that child.
- ensure that Prevent Guidance is understood and procedure followed.
- be alert to specific needs of **less advantaged children, those with safeguarding concerns, SEND and young carers.**
- carry out regular reviews under the auspices of the proprietor of the school's child safeguarding policies and procedures and of the efficiency with which its duties have been fulfilled; remedy any identified weaknesses without delay.
- Staff need to be made aware of that mental health concerns maybe an indicator of abuse, neglect and or exploitation. Our staff are not qualified to make a diagnosis but are well placed to observe and identify mental health concerns and behaviours.
- Include in the curriculum activities and opportunities for PSHE/Citizenship/ Relationships Education, Relationships and Sex Education and Health Education which equip children with the skills they need to stay safe from abuse (including online and other contexts children are in), and to know to whom they can turn for help;
- Students are encouraged to report concerns to staff although we are aware that some students may find this hard and the use of the [help@twycrosshouseschool.org.uk](mailto:help@twycrosshouseschool.org.uk) email allows students to report something without having to discuss it immediately face-to-face.





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### **Actioned changes since last Review**

1. Updated guidance and policies to reflect the DfE's advice on Behaviour in Schools: advice for Headteachers and School Staff 2022. This document has been used in conjunction with Keeping children safe in education 2023 and Sexual violence and sexual harassment between children in schools and colleges (DfE, 2021) to update various policies notably: Anti Bullying, Behaviour Policy and Daily Expectations.
2. The creation of Daily Expectations Policy was to help highlight the purpose of policies at a relatable level for all parts of the school community.
3. Child on Child: Sexual violence and harassment. The school is continuing to emphasise the importance of explaining to children that the law is in place to protect rather than criminalise them
  - the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
4. **Significant focus on Filtering and Monitoring: A whole school approach.**
  - a. Key focus in staff training- Filtering and Monitoring within our school community and the expectations of staff.
  - b. Updated Induction policy that highlights the importance of filtering and monitoring.
  - c. Annual review created to replicate Safeguarding, Prevent, Safer Recruitment and GDPR reviews. Further increasing the importance of Filtering and Monitoring within the school. (See appendix 11)
  - d. Responsibility of Filtering and Monitoring and Online Safety included into Lead DSL job description.
  - e. Online Safety Curriculum Overview to be annually reviewed to help ensure it is current and effective for educating and supporting our school community.
  - f. Professional guidance from 2 technical companies to ensure our Filtering and Monitoring procedures within school are compliant to all standards notably to the responsibilities within Safeguarding and Prevent
  - g. Guidance from Cyber Security Standards in Schools and Colleges used to update our Acceptable use policy for students. This also reflects the updates in KCSIE 2023.
  - h. Updated Staff ICT Code of Conduct to reflect the heightened level of Filtering and Monitoring.
5. Domestic abuse is a pivotal focus in policies and training. Operation Encompass delivered Inset training to all staff in September focussing on Domestic Abuse.
6. Increased emphasis in policies and training to reflect the importance of Equality Act 2010 to school safeguarding. Including that schools and colleges:
  - must not unlawfully discriminate against pupils because of their protected characteristics
  - must consider how they are supporting pupils with protected characteristics
  - must take positive action, where proportionate, to deal with the disadvantages these pupils face.
7. Raised awareness within the school regarding the Public Sector Equality Duty (PSED) for education settings. This includes a need to be conscious that pupils with protected characteristics may be more at risk of harm.



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8. Increased guidance for all staff and DSL's around the Early Help Process especially differences across counties. Lead DSL attended training - May 2023.
9. Annual consultation with parents/carers regarding the content and delivery of PSHE, RSE and Safeguarding within the curriculum.
10. Increased support for LGBTQ+ students. Reflected in policies, staff training and PSHE curriculum.
11. Updated safeguarding procedures with regards to 'Out of School' settings.
12. Updated Safer Recruitment Policy to reflect the best practice to inform candidates of online checks.
13. Updates to Forced Marriage within Child Protection Policy
14. Guidance taken from Multi-agency Practice Principles for responding to child exploitation and extra-familial harm for staff training, DSL support procedures and updated Child Protection Policy.



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### **Roles and Responsibilities**

#### **The whole school community**

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the school.

#### **The Role of the Headmaster**

The Headmaster of the school will ensure that:

- The policies and procedures are effectively implemented and followed by all staff;
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children;
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to children or young people are notified to the Local Authority Designated Officer, where the threshold is met.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children and Family Specialist Services) or the Police.

#### **The Role and Responsibilities of the Lead Designated Safeguarding Lead (DSL), Deputy Designated Leads (DDSL)**

##### **Role**

The Designated Safeguarding Lead (or a Deputy) will always be available for staff to discuss any safeguarding concerns. A full list of responsibilities of the DSL are found in Annex C of "Keeping children safe in education". The DSL is a senior member of staff on the senior leadership team and the role is explicit in their job description.

##### **Responsibilities:**



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- **Managing referrals** – to the local authority children's social care, to the Channel programme, to the Disclosure and Barring Service for staff dismissed for safeguarding concerns (as required), to the Police where a crime may have been committed.
- **Working with others** – to act as a source of support and advice, to act as a point of contact for the safeguarding partners, to liaise with the Headmaster or principal about issues especially to do with ongoing enquiries under section 47 of the Children Act 1989 and police investigations, to liaise with staff when deciding to make a referral to relevant agencies so that children's needs are considered holistically, to liaise with the senior mental health lead, to promote supportive engagement with parents and carers, to take the lead in promoting educational outcomes for children in need and those with a social worker. To fully support the Multi Agency safeguarding arrangements (KCSE Sept 23). The DSL and Headmaster will fully contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children. We are aware that all three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children.
- **Information sharing and managing safeguarding records** – keeping records confidential, secure and up to date, in a separate record for each child, including a clear and comprehensive summary, detailing how the concern was followed up and resolved, with a note of actions, decisions and the outcome, sharing information as required to safeguard children and transferring records and other relevant information to the new school within 5 days or in advance if necessary
- **Raising Awareness** – ensuring each member of staff and volunteer understands the child protection policy which is reviewed at least annually, making it available publicly, ensuring staff and governors have access to relevant training and induction, promoting educational outcomes by sharing relevant information about vulnerable children
- **Training, knowledge and skills** – to undergo DSL training every two years (updating at least annually via bulletins etc) and to attend Prevent awareness training, in order to understand assessment and referral processes, to contribute effectively to child protection conferences including the importance of sharing information, to understand the lasting impact that adversity and trauma can have on children and how to respond to this, to be alert to children with specific needs eg SEND, those with health conditions and young carers, to understand the unique risks associated with online safety
- **Providing support to staff** – to help them feel confident on welfare, safeguarding and child protection matters, to provide support in the referral process if required and to help them to understand that safeguarding and educational outcomes are linked
- **Understanding the views of all children** – encouraging a culture of listening to all children (including those who are known to be disproportionately impacted by different forms of harm and abuse e.g. LGBTQ+ pupils, disabled children or girls) and taking account of their wishes and feelings in measures taken to protect them and understanding the difficulties children may have in approaching staff about their circumstances



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- **Holding and sharing information** – sharing with safeguarding partners, other agencies and professionals and transferring records between schools and colleges in accordance with data protection legislation, keeping detailed, accurate and secure written records and understanding the purpose of this. Understand and implement relevant data protections laws and regulations including GDPR – *The Data Protection Act (2018) and GDPR do not prevent the sharing of information for the purposes of keeping children safe.*

- **Filtering and Monitoring** - The Lead DSL must take responsibility for the implementation and effectiveness of Filtering and Monitoring within the school including Online Safety. Annual reviews and consistent fluid approach to monitoring practices must be used to ensure that all aspects of the school community are safeguarded correctly.

### □ **Records, Monitoring and Transfer**

- Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the school. Records of concerns are written down, signed and dated and passed immediately to the Designated Safeguarding Lead (or a Deputy). The Lead DSL is responsible for such records and for deciding at what point these records should be passed over to other agencies (in accordance with the Data Protection Act 2018 and GDPR principles).
- Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.
- Child protection records are stored securely, with access confined to specific staff, e.g. Designated Safeguarding Leads, Deputies and the Headmaster.
- Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.
- When children transfer school, their safeguarding records are also transferred within 5 days. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a DSL in the receiving school, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. Where a child needs specific ongoing support, relevant information will be transferred prior to the child arriving at their new school. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named DSL/DDSL and a photocopy kept. Files requested by other agencies e.g. Police should be copied.

## **Safeguarding in the Curriculum**

Students are taught about safeguarding in school. The following areas are among those addressed in PSHE and Relationships Education, Relationships and Sex Education and Health Education and in the wider curriculum:



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- Bullying (including Cyberbullying)
- Drugs, alcohol and substance misuse (including awareness of County Lines and the Criminal Exploitation of children where appropriate)
- Online safety **including the importance of filtering outside of school.**
- The danger of meeting up with strangers
- Fire and water safety
- Road safety
- Domestic Abuse
- Healthy Relationships / Consent
- (so called) Honour Based Abuse issues e.g. forced marriage, Female Genital Mutilation (FGM) (see Appendix 7),
- Sexual exploitation of children (CSE), including online
- Child criminal exploitation (including cybercrime)
- Preventing Extremism and Radicalisation (see Appendices 5 & 6)

### **Guidance and Support to pupils and School staff**

#### **Guidance for staff in dealing with pupils**

It is vital that all adults working at Twycross House School take careful note of the symptoms of abuse and bear in mind the training they have received.

It is the responsibility of all teachers and volunteers who work with young people at Twycross House School not to place pupils in a situation which might cause them harm or might lead to allegations that they were at risk of harm.

They must also ensure that their conduct, language, behaviour and dress in the presence of young people is so measured and appropriate at all times that it can never attract an allegation of impropriety or abuse. (see Code of Conduct Policy and Daily Expectations)

The school will offer its total support to any member of staff who is the victim of an unfounded or malicious allegation of misconduct towards a pupil.

Our school recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children school may be one of the few stable, secure and predictable components of their lives.

#### **Suspensions**

If you suspect that a child is being harmed or neglected, make a note of your concerns. Record what has been said, what has been seen and any concerning behaviours. Discuss this with DSL/DDSLs immediately. If a DSL cannot be found then a member of SLT can deputise whilst a DSL is being contacted.



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### Disclosure

A child may surprise you by indicating that he/she would like to tell you something very important if you will keep it secret. Be receptive but make it clear that you may have to share the information with another person. Keep calm, maintain eye contact and show acceptance of what the child says. Listen, but do not press for details or interrogate the young person, as this is the police's role and could easily compromise a subsequent investigation. All we need to know is **Who? What? When?**

Remember the child may have been threatened and will almost certainly be feeling very guilty, so reassure him/her. Do NOT promise confidentiality. Explain that you are going to contact Mr Knight/Mrs Lauder/Mr Westaway/Mrs Paul/Mrs Williams-Gould for some advice and help.

Write down as soon as possible the questions you asked and the responses, as far as you can, including any other relevant information. Note the time and date (including the day) and sign the notes. Take this immediately to the DSL and do not discuss the concern with anyone implicated in the abuse.

### **Support to pupils and school staff**

**Support to pupils (including those with a disability or about whom there are mental health concerns)** THS recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view their lives in a positive way and that this is likely to adversely impact their mental health and emotional well-being. Children may be vulnerable because, for instance, they have needed an allocated social worker, have a disability, are in care, a care-leaver or previously looked after, or are experiencing some form of neglect. It is therefore important that staff recognise that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. For such children school may be one of the few stable, secure and predictable components of their lives. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following this policy and speaking to the DSL or a deputy. Our school seeks to remove any barriers that may exist in being able to recognise abuse or neglect in pupils with Special Educational Needs, disabilities or physical health issues. These barriers include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.



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- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

We will seek to provide such children with the necessary support to build their self-esteem and confidence, helping them to secure the very best educational outcomes they are able to achieve. Mrs Avaraki (Well-being Officer), the safeguarding team and the pastoral support system will work collectively to address these barriers.

The context in which safeguarding incidents and/or behaviours occur, whether in school or within or outside the home (including online), will be considered by staff, particularly the DSL and Deputy DSLs. Any associated threats or risks will be included in assessments and relevant information included in referrals to Children's Social Care. General indicators of abuse and neglect (from Part 1 of the statutory guidance) are also included in Appendix 9 of this policy and further information about specific forms of abuse are contained within Appendix B of the statutory guidance, "Keeping Children Safe in Education".

**Child on child abuse** - We recognise that children sometimes display harmful behaviour themselves and that even if there are no reports, it may still be happening. Incidents or allegations will be referred on for appropriate support and intervention. Such abuse is unacceptable and will not be tolerated at all or passed off as "banter", "just having a laugh" or "part of growing up". This abuse could for example include sexual violence and sexual harassment, "upskirting", initiation/hazing type violence, all forms of bullying, abuse in intimate relationships between peers, consensual and non-consensual sharing of indecent images, causing someone to engage in sexual activity without consent and physical violence (eg hitting, kicking, shaking, biting, hair pulling, etc). This may be experienced by both boys and girls, however, girls are more likely to be the victims and boys perpetrators. Some pupils may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. We will therefore take positive action to create a culture of support and to ensure that girls and vulnerable groups such as LGBTQ+ and pupils from ethnic minority backgrounds feel confident to bring forward any concerns and have a safe space to talk to trusted staff about their experiences. There are different school and local authority or Safeguarding Children Partnership guidance and policies which detail the school's procedures to address and minimise these concerns including;

1. Pupil Behaviour Policy
2. Anti-bullying Policy
3. Trauma informed Relationships and behaviour Policy





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4. Social, Emotional and Mental Health Policy
5. Acceptable Use Policy
6. Daily Expectations
7. E-safety/Online safety Policy
8. "Guidance for schools working with children who display harmful sexual behaviour"  
(Leicestershire LA Guidance)
9. DfE guidance Part 5 of "Keeping children safe in education".

All children will be encouraged to report to a trusted adult in school all incidents of child on child abuse wherever it may have happened and will be taught about alternative ways of doing this both in school and elsewhere eg via email. They will always be taken seriously and never given the impression that they are creating a problem by reporting their concern or made to feel ashamed. It is recognised that even where no reports are received, this does not mean that such abuse is not taking place. It could just be that it has not been reported. Where an incident has occurred or specific risks are identified, the details will be added to a safeguarding or behaviour record for the children concerned and a thorough investigation conducted by the DSL, where appropriate. A written risk assessment will be undertaken by the DSL in order to minimise the risk of further harm and to ensure the safety of all staff and pupils. Parents or carers of the children involved will be informed as soon as it is appropriate to do so. Support plans will be written and help offered, by different adults in school (to avoid a possible conflict of interest), to the alleged victim, the child or young person accused and any other children involved. A referral to any relevant outside agency will be made e.g. Police or Social Care.

The following steps will be taken to minimise the risk of child on child abuse:

- Staff training to ensure an understanding of what it is and how to recognise signs
- Promotion of a supportive environment by teaching about acceptable and unacceptable behaviours (including online) in both assemblies and the wider curriculum eg PSHE and RSE
- Clear procedures put in place to govern the use of mobile phones in school
- Appropriate staff supervision of pupils and identifying locations around the school site that are less visible and may present more risk to pupils

**Online safety** – We recognise that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face. Some children may use mobile and smart technology outside of school, to sexually harass their peers, share indecent images (consensually and non-consensually) and view and share pornography and other harmful content. Many children have unrestricted access to the internet via their mobile phones and our online safety policy describes the rules governing their use in school. **We operate a system that no child should have their mobile phone with them at any time whilst on school site.** It also sets out the school's response to incidents which may involve one or more of the four areas of risk – content, contact, conduct and commerce. Online safety is a consideration running through the planning and implementation of all relevant policies and procedures. Staff will always respond



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if informed that children have been involved in sharing indecent images. The DfE guidance “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (Dec 2020) will be used to guide the school’s response on a case by case basis.

The key points for staff and volunteers (not including the DSL) being:

- Report immediately to the DSL
- Do not view, copy, print, share, store or save the imagery, or ask a child to share or download.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it. Leave this for the DSL if needed.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

The school is aware that students with advanced coding/computer skills are vulnerable to becoming involved in cyber crime, often in complete ignorance of offences under the “Computer Misuse Act”. Schools have a responsibility to educate children about this and to identify any student whose skills may lead them in this direction. At THS, key members of staff will attend briefings provided by police’s Cyber Prevent Team (soon to re-named Cyber Choices) in order engage with students, schools and families to raise skill levels and to work alongside young people to give them brilliant opportunities to develop their skills in positive ways. All children at THS are taught about Online safety as part of the curriculum. Students will learn about cyber crime as part of formal Computing lessons with Head of Computing/DDS (Mr Westaway)

**Sexual violence and sexual harassment** – Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including rape and sexual assault. Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline and may include sexual name-calling, taunting or “jokes” and physical behaviour, for example, deliberately brushing against someone or interfering with clothes. ‘Upskirting’ is also a criminal offence (under the Voyeurism (Offences) Act 2019) and typically involves taking a picture under a person’s clothing (not necessarily a skirt) without them knowing, in order to obtain sexual gratification or to cause humiliation, distress or alarm (anyone of any gender can be a victim). Evidence shows that girls, children with SEND and LGBTQ+ students are more likely to be the victims of sexual violence and harassment and boys are more likely to be the perpetrators. We will take positive action to create a safe and supportive culture in



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school, recognising the disproportionate vulnerability of these groups so that all pupils feel supported and have a safe space in order to speak openly with trusted adults if they wish to do so. Sexual violence and sexual harassment can occur between children of any gender.

### Curriculum

- Planned PSHE and Relationships, Sex and Health Education will include personal privacy, respect and consent so that children will have a better understanding of how to behave towards their peers including online. This will be taught alongside other safeguarding issues as set out in the DfE statutory guidance “Relationships Education, Relationships and Sex Education (RSE) and Health Education”. This will be appropriate to pupils’ age and stage of development. It will also be underpinned by the school’s behaviour policy and pastoral support system.

### Responding to an incident

- School will follow the DfE guidance on ‘Child-on child sexual violence and sexual harassment’, in Part 5 of “Keeping children safe in education”.
- Relevant staff will liaise with the police, social care and parents as appropriate.
- Support will be offered to both the alleged victim(s) and child(ren) accused. Parents will be included in discussions about the format that this support will take.

### Children Missing from Education and Children Absent from Education

THS recognises the entitlement that all children have to education and will work closely with the local authority Inclusion Service to share information about pupils who may be missing out on full time education or who go missing from education. We recognise that when children go missing this is a sign that they may have been targeted by perpetrators of Child Sexual Exploitation and/or drug related criminals (County Lines). Children may also be groomed into participating in other forms of criminal exploitation including cybercrime, serious violence and violent crime. We are aware that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The local authority will also be informed where children are to be removed from the school register a) to be educated outside the school system; b) for medical reasons; c) because they have ceased to attend; d) because they are in custody; d) because they have been permanently excluded. Children who attend an alternative education provision or have an agreed reduced timetable are more likely to be vulnerable to these forms of exploitation.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as



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increased status) of the perpetrator or facilitator. CSE and CCE can affect both males and females and can include children who have been moved (trafficked) for the purpose of exploitation. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted - exploitation, as well as being physical, can be facilitated and/or take place online. CSE can include 16- and 17-year olds who can legally consent to sex but they may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines) and serious violent crime. 'County Lines' involves drug networks or individuals exploiting children and young people into carrying drugs and money between cities, towns and villages. Serious violent crime can be associated with this form of criminal activity together with child sexual exploitation. Children may also be exploited into committing cybercrime or money laundering offences and organised criminal groups or individuals may exploit children and young people with enhanced computer skills to access digital networks and/or data for criminal and financial gain. Children with bank accounts may be persuaded to allow criminals to use their banking facilities to launder money. CCE can also involve working in cannabis factories, shoplifting or pickpocketing and may involve coercing children to commit vehicle crime or serious violence towards others. It is important to note that the experience of girls can be very different to that of boys but girls are also at risk. Criminal exploitation of children is a form of harm that can affect children in both a physical environment and online. Staff training includes raising awareness of these issues, the importance of a multi-agency response and how concerns are dealt with and passed to the Designated Safeguarding Lead who will make a risk assessment and refer to Local Authority First Response Children's Duty if appropriate.

**Serious violence** – is associated with a number of risk indicators in children including increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. Staff will be made aware of these and of the other risk factors which increase the likelihood of involvement in serious violence, including, being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery. Staff training will raise awareness to these risks and any concerns will be passed to the DSL to coordinate a safeguarding response.

**So-called 'honour-based' abuse** - encompasses crimes which have been committed to protect or defend the so-called "honour" of the family and/or the community, including Female Genital Mutilation (FGM) (see appendix 7), forced marriage, and practices such as breast ironing. All forms of so called Honour Based Abuse are abuse (regardless of the motivation) and concerns will be passed to the Designated Safeguarding Lead for onward referral as required.



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**Modern slavery and human trafficking** – can take on many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Children may be trafficked into the UK from abroad or moved around the country. Staff need to be aware of indicators which include, but not limited to, neglect, isolation, poor living conditions, having few personal belongings and a lack of trust and reluctance to seek help. Staff will refer any concerns to the DSL without delay who will take action and also refer victims to the National Referral Mechanism ([www.gov.uk](http://www.gov.uk)).

**Private fostering arrangements** - Where a child under 16 (or 18 with a disability) is living with someone who is not their family or a close relative for 28 days or more, staff inform the Designated Safeguarding Lead so that a referral to Children's Social Care for a safety check, can be made. (A close relative includes step-parent, grandparents, uncle, aunt or sibling).

**Domestic abuse** - can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Staff will refer concerns to the DSL and where the police have attended an incident of domestic abuse and school receive an "Operation Encompass" call, any pupil who may have been impacted will be supported.

The revised definition (in the Domestic Abuse Act 2021) allows for children to be recognised as victims of domestic abuse in their own right if they see, hear or experience the effects of the abuse.

### Children who may require early help

All Staff working within the School should be alert to the potential need for early help for children, following the procedures identified for initiating early help using the local and current Safeguarding Partnership Threshold Document, and also consideration for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Is a privately fostered child;
- Has returned home to their family from care;
- Is showing signs of engaging in anti-social or criminal behaviour;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence; and/or
- Is showing early signs of abuse and/or neglect;



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- Is showing signs of displaying behaviour or views that are considered to be extreme;
- Is misusing drugs or alcohol themselves;
- Not attending school or are at risk of exclusion from school;
- Frequently going missing/goes missing from care or from home;
- Is at risk of modern slavery, trafficking, exploitation, radicalised;

These children are therefore more vulnerable. We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

Sibling Support – importance of understanding intra familial harms and necessary support for siblings following incidents.

Complaints or concerns raised by parents or pupils will be taken seriously and followed up in accordance with the school's complaints process.

### **Adverse Childhood Experiences (ACEs)**

Adverse childhood experiences, or ACEs, are potentially traumatic events that occur in childhood (0-17 years).

For example:

- experiencing violence, abuse, or neglect
- witnessing violence in the home or community
- having a family member attempt or die by suicide

Also included are aspects of the child's environment that can undermine their sense of safety, stability, and bonding, such as growing up in a household with:

- substance use problems
- mental health problems
- instability due to parental separation or household members being in jail or prison

ACEs are linked to chronic health problems, mental illness, and substance use problems in adulthood. ACEs can also negatively impact education, job opportunities, and earning potential. Our Trauma informed Relationships and Behaviour Policy expands upon ACE's further

### **Support for Staff**

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child/young person as part of a disclosure or from another adult, that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the Designated Safeguarding Lead about the support they require. The Designated Safeguarding Lead will seek to arrange the necessary support.

### **Working with parents/carers**



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THS will:

- Ensure that parents/carers have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.
- Undertake appropriate discussion with parents/carers and seek necessary consent prior to involvement of Children & Family Services (Children's Social Care) or another agency, unless to do so would place the child at risk of harm or compromise an investigation.

### **Related Policies and Documents**

THS's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance

- Behaviour, Relationships and Support Policy
- Trauma informed relationships and behaviour policy
- SEMH Policy
- Staff Code of Conduct ("Guidance for Safer working practice") and ICT Code of Conduct
- Anti-Bullying (including Cyberbullying)
- Physical Interventions/Restraint (DfE Guidances "Use of Reasonable Force" and "Screening, searching and confiscation")
- Special Educational Needs and Disability
- Daily expectations
- Trips and visits
- Work experience and extended work placements
- First aid and the administration of medicines
- Health and Safety
- Relationships Education, Relationships and Sex Education and Health Education
- Site Security
- Equal Opportunities
- Online safety
- Whistle Blowing
- Extended school activities

The above list is not exhaustive but when undertaking development or planning of any kind the school will consider the implications for safeguarding and promoting the welfare of children.

### **Recruitment and Selection of Staff (also see the Safer Recruitment policy)**

*Trained Safer Recruitment Staff: Luke Knight, Charlotte McDermott and Rowan Williams Gould*



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The school's safer recruitment processes follow the statutory guidance: "*Keeping children safe in education, Part Three: Safer recruitment.*"

THS will provide all the relevant information in references for a member of staff about whom there have been safeguarding concerns i.e. about child protection / inappropriate conduct. Cases in which the conclusion of an allegation has been unsubstantiated, unfounded, false or malicious will not be included in employer references. A history of repeated safeguarding concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

The school has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction and are briefed on the code of conduct for adults working with children. The Leicestershire County Council induction leaflet is given to all staff and is the basis for the safeguarding induction.

In line with statutory requirements, every recruitment process for school staff will have at least one member (teacher/manager or governor) who has undertaken safer recruitment training.

Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (last updated August 2018).





## **APPENDIX I**

PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE,  
OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

### **Contents**

<b>A</b>	<b>General</b>	
<b>B</b>	<b>Individual Staff/Volunteers/Other Adults - main procedural steps</b>	
<b>C</b>	<b>Designated Safeguarding Lead – main procedural steps</b>	

### **A. General**

1) The Leicestershire and Rutland Safeguarding Children Partnership Procedures contain the inter-agency processes, protocols and expectations for safeguarding children. (Available on the website [www.lrsb.org.uk](http://www.lrsb.org.uk): The Designated Safeguarding Lead is expected to be familiar with these, particularly the indicators of abuse and neglect and the referral processes.

2) It is important that all parties act swiftly and avoid delays.

3) Any person may seek advice and guidance from the First Response Children's Duty Professionals Consultation Line, particularly if there is doubt about how to proceed. Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.

4) A record, dated (including the day and time) and signed, must be made as to what has been alleged, noticed and reported, and kept securely and confidentially.

5) In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and requires assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject



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of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral might put the child at risk and/or undermine Police enquiries, and in individual cases, advice from Children's Social Care will need to be taken.

### **B. Individual Staff/Volunteers/Other Adults – main procedural steps**

- 1) When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine or photograph children, or promise confidentiality. Children making disclosures should be reassured and if possible at this stage should be informed what action will be taken next.
- 2) As soon as possible make a dated (including the day), timed and signed record of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead in the school.
- 3) If the concern involves the conduct of a member of staff or volunteer, a visitor, a governor, a trainee or another young person or child, the Headmaster must be informed.
- 4) If the safeguarding concern or allegation is about the Headmaster, the information should be **reported the LADO and/or** passed to Lead DSL – Luke Knight
- 5) If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

### **C. Designated Safeguarding Lead – main procedural steps**

- 1) Begin an individual case record for each child involved which will hold a record of communications and actions to be stored securely (see section on Records, Monitoring and Transfer). Include a chronology of case activity.
- 2) Where initial enquiries do not justify a referral to the investigating agencies, inform the initiating adult and monitor the situation. If in doubt, seek advice from the First Response professional's consultation line.
- 3) Share information confidentially with those who need to know.
- 4) Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care, the First Response Children's Duty should be contacted by phone (contact the local authority Children's Services where the child lives). Written confirmation should be made within 24 hours on the Multi-Agency Referral Form to Children's Social Care. All other referrals should be made using the online form (see link <http://lrsb.org.uk/childreport>).



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- 5) If the concern is about children using harmful sexual behaviour, also refer to the separate guidance, "Guidance for schools working with children who display harmful sexual behaviour" (Leicestershire LA Guidance).
- 6) If it appears that urgent medical attention is required, arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
- 7) Exceptional circumstances: If it is feared that the child might be at immediate risk of leaving school, take advice from the First Response Professionals Consultation line (for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (eg a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated and the Police should be contacted immediately.

### **APPENDIX 2**

#### **PROCESS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS AGAINST STAFF (INCLUDING HEADMASTERS), VOLUNTEERS AND CONTRACTORS.**

These procedures should be followed in all cases in which there is an allegation or safeguarding concern that a person working with children has:

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

There is also a school "Low-level concerns policy" which should be followed if the concern does not meet the allegations threshold above or is not considered serious enough to make a referral to the LADO.

Relevant documents:

- DfE "Keeping children safe in education: Statutory guidance for schools and colleges" (part 4: Allegations made against/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors)

#### **1) Individual Staff/Volunteers/Other Adults who receive the allegation:**



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- i. Write and sign a dated and timed note of what has been disclosed or noticed, said or done.
- ii. Report immediately to the Headmaster.
- iii. Pass on the written record.
- iv. If the allegation or safeguarding concern is about the conduct of the Headmaster, report immediately to the Lead DSL. Pass on the written record.

### **2) Headmaster (or Lead DSL)**

- i. If there is no written record, write and sign a dated and timed note of what has been disclosed or noticed, said or done.
- ii. Before taking further action, notify and seek advice from the Allegations Manager (LADO), Safeguarding and Improvement Unit on the same day.
- iii. You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation at this stage.
- iv. Report to First Response Children's Duty if the Allegations Manager (LADO) advises or if circumstances require a referral concerning a child.

Ongoing involvement in cases:

- Liaison with the Allegations Manager (LADO)
- Co-operation with the investigating agency's enquiries as appropriate (including working closely with the employment agency in the case of supply teachers).
- Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.
- Possible referral to the DBS or The Teaching Regulation Agency, depending on the outcome.

### **Suspension**

An accused teacher will be suspended from duty only in unusually serious circumstances; for instance, where a child is deemed to be at risk of harm or where it is discovered that the Secretary of State has made an interim prohibition order on the teacher concerned.

Because of the potential permanent damage to an employee's professional reputation from an allegation which is later found to be unwarranted, suspension is only implemented if all other options have been explored and a risk assessment suggests it is necessary; the LADO will be able to offer advice about this. Possible alternatives might be:

- redeployment within the school so that the individual does not have direct contact with the child/children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeployment to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child to a different class where they will not come into contact with the individual.



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Written confirmation of suspension should be dispatched within one working day and should contain as much detail about the reasons for it as is appropriate. Care should be taken to ensure that a suspended employee is kept informed both of the progress of their case and current work-related issues. Social contact with colleagues should not be prevented unless it might be thought to compromise the gathering and presentation of evidence.

### **Supporting those involved**

An accused teacher, whether suspended or not, should very swiftly be allocated a named representative to provide them with as much information as is possible and appropriate, and offered effective support as part of the employer's duty of care. They should be advised also to contact their trade union representative or a colleague for support.

Parents and carers of a child involved should be told about the allegation as soon as possible; however, if other agencies are involved in a strategy discussion with the school, only agreed information should be disclosed. Parents and carers should be accorded all the support the school can offer and be kept informed about the general progress of the case and any outcomes (with due regard to the confidentiality of other parties). They should be made aware of the reporting restrictions on allegations against teachers, which extend to social networking sites. If they wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

If the child has been harmed, children's social care services will advise on what support may be needed.

Where an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with children. Where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but the Headmaster / DSL need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

### **Confidentiality (Refer to KCSE September 2023)**

The confidentiality of all parties should be protected from the outset and should be managed carefully. Parents/carers should be made aware of the importance of maintaining confidentiality about any allegations made against teachers whilst the investigation is ongoing (section 14F of the Education Act 2002). Outside agencies such as the LADO, police or children's services will offer advice on who needs to know what; managing information, speculation, leaks, gossip and press interest.

### **Resignations and 'compromise agreements'**

If the accused individual resigns, this will not prevent an allegation being followed up.



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The school undertakes to report as soon as possible to the Secretary of State, via referral to the **Disclosure and Barring Service (DBS)** any employee, volunteer or student whose services are no longer used because he/she is believed to have harmed a child or to pose a risk of harm to children. In serious cases a referral will also be made to the Teaching Regulation Agency. There can be no 'compromise agreements' between the school and the adult in question.

### APPENDIX 3

#### Low-level Concerns Policy

##### Purpose

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (Feb 2023) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

##### Who does the policy apply to?

This policy applies to all staff and other individuals who work or volunteer in school.

##### Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (Feb 2023), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

##### Reporting low-level concerns

Where a low-level concern has been identified this will be reported as soon as possible to the **Headmaster**. However, it is never too late to share a low-level concern if this has not already happened.



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Where the Headmaster is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (i.e. the most senior member of SLT acting in this role).

Low-level concerns about the Designated Safeguarding Lead will be reported to the

Headmaster and those about the Headmaster will be reported to the Designated

Safeguarding Lead – Mr Luke Knight **and/or the LADO**. A low-level concern about a

contractor will be reported to the Headmaster and their employer.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Headmaster of the details as soon as possible.

### Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the Headmaster a record of the conversation will be made by the Headmaster which will be signed, timed, and dated.

### Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headmaster will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour;

i) is consistent with the “Guidance for safer working practice for those working with children and young people in education settings” (Feb 2023): no further action will be required,

ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy.

iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.

iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the



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school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.

- Records will be made of, i) all internal conversations including any relevant witnesses, ii) all external conversations e.g. with the LADO iii) the decision and the rationale for it, iv) any action taken

### **Can the reporting person remain anonymous?**

The person bringing forward the concern will be named in the written record. Where they request to remain, anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

### **Should staff report concerns about themselves (i.e. self-report)?**

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

### **Where behaviour is consistent with the "Guidance for safer working practice" (Feb 2023)**

Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

### **Should the low-level concerns file be reviewed?**

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

### **References**

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.





## **APPENDIX 4**

### **Outline for the use of Cameras and Mobile Phones**

To ensure the safety and welfare of the children in our care this policy outlines the protocol for the use of personal mobile phones and cameras in the school.

- Mobile phones must not be used in any teaching area for Form 3 – 5 students. All staff must ensure that their mobile phones, personal cameras and recording devices are stored securely during working hours on school premises or when on outings. (This includes visitors, volunteers and students)
- If staff members need to take their phone into the teaching environment for S1 – U6 students then they must take utmost precautions.
- If in an extremely unlikely case that staff need to use their mobile phone within the teaching environment they must request the use of mobile phones with a member of SLT **prior** to the lesson taking place. All other options must be explored prior to asking for the use of mobiles within lessons.
- No mobile phone should be ever be used within toilets or changing areas
- Only school equipment should be used to record classroom activities. Photos should be put on the school system as soon as possible and not sent to or kept on personal devices
- During school outings nominated staff will have access to a school mobile which can be used for emergency or contact purposes
- All telephone contact with parents or carers must be made on the school phone and a note kept
- Parents or carers are permitted to take photographs of their own children during a school production or event. The school protocol requires that photos of other people's children are not published on social networking sites such as Facebook.



## **APPENDIX 5**

### **Safeguarding pupils who are vulnerable to extremism and radicalisation**

Our school recognises the duties placed on us by the Counter Terrorism Bill (July 2015) to prevent our pupils being drawn into terrorism.

These include:

- Assessing the risk of pupils being drawn into terrorism (see Appendix 5)
- Working in partnership with relevant agencies (including making referrals) under the Safeguarding Children Partnership procedures
- Appropriate staff training
- Appropriate online filtering

Our school is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

Our school seeks to protect children and young people against the messages of all violent extremism including but not restricted to those linked to Islamist Ideology, Far Right / Neo Nazi / White Supremacist ideology etc. Concerns should be referred to the Designated Safeguarding Lead who has local contact details for the Prevent Engagement Team (Police) and Channel referrals. They will also consider whether circumstances require Police to be contacted urgently.



## **APPENDIX 6**

### Radicalisation and Extremism Risk Assessment

	<b>Yes/No</b>	<b>Evidence</b>
Does the school have a policy?	Yes	Ofsted File
Does the school work with outside agencies on radicalisation and extremism e.g. Channel?	Yes	Prevent Policy
Have staff received appropriate training?	Yes	Annual training (January)
Has the school got a trained Prevent lead?	Yes	Charlotte Lauder
Do staff know who to discuss concerns with? (DSL)	Yes	Assemblies
Is suitable filtering of the internet in place?	Yes	Mr Westaway
Do children know who to talk to about their concerns?	Yes	Assemblies, previous disclosures
Are there opportunities for children to learn about radicalisation and extremism?	Yes	PSHE & Assemblies
Have any cases been reported?	No	As of yet
Are individual pupils risk assessed?	N/A	Would happen if a concern arose
What factors make the school	Far Right following local town.	



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community potentially vulnerable to being radicalised?		Internet can reach any student. E-Safety is paramount to help protect and educate students.
Comment on the school's community, locality and relevant history Local towns have had previous support for far right views. Continuing to assess and remain updated with support/education being put in place.		
Risk evaluation	<b>Low</b> <b>Medium</b> <b>High</b>	Way Forward Continue to train staff and students. Monitor and assess.

Date completed.....05/09/22.....

Signed.....

### **APPENDIX 7**

#### **Female Genital Mutilation**

Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM. The school's response to FGM will take into account the government guidance, "Multi-agency statutory guidance on female genital mutilation" updated October 2018. Staff will also follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Lead and a report must also be made to the Police.

There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (eg there is a known history of practising FGM in her family, community or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and/or making a referral to Children's Social Care. If the risk of harm is imminent there are a number of emergency measures that can be taken including police protection, an FGM protection order and an Emergency Protection Order.

#### **Fabricated or Induced Illness (FII)**

Some of the indicators of this rare form of abuse are: the medical history doesn't make sense, treatment is ineffective, the symptoms disappear when the carer isn't around, and they can be seen repeatedly by different professionals looking for different things. Concerns will be passed on to the DSL for onward referral as required.



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Please refer to 'Safeguarding children in whom illness is fabricated or induced'- DfE 2008 for further information and guidance.

### **APPENDIX 8**

All Staff working within the School should be alert to the potential need for early help for children, following the procedures identified for initiating early help using the local and current Safeguarding Partnership Threshold Document, and also consideration for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Is a privately fostered child;
- Suffered ACE's
- Has returned home to their family from care;
- Is showing signs of engaging in anti-social or criminal behaviour;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence; and/or
- Is showing early signs of abuse and/or neglect;
- Is showing signs of displaying behaviour or views that are considered to be extreme;
- Is misusing drugs or alcohol themselves;
- Not attending school or are at risk of exclusion from school;
- Frequently going missing/goes missing from care or from home;
- Is at risk of modern slavery, trafficking, exploitation, radicalised;

These children are therefore more vulnerable we will seek to provide such children with the necessary support and to build their self-esteem and confidence.

**Remember that sexual abuse is found across all classes and sectors of society.**

**Indicators of abuse and neglect**



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

**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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

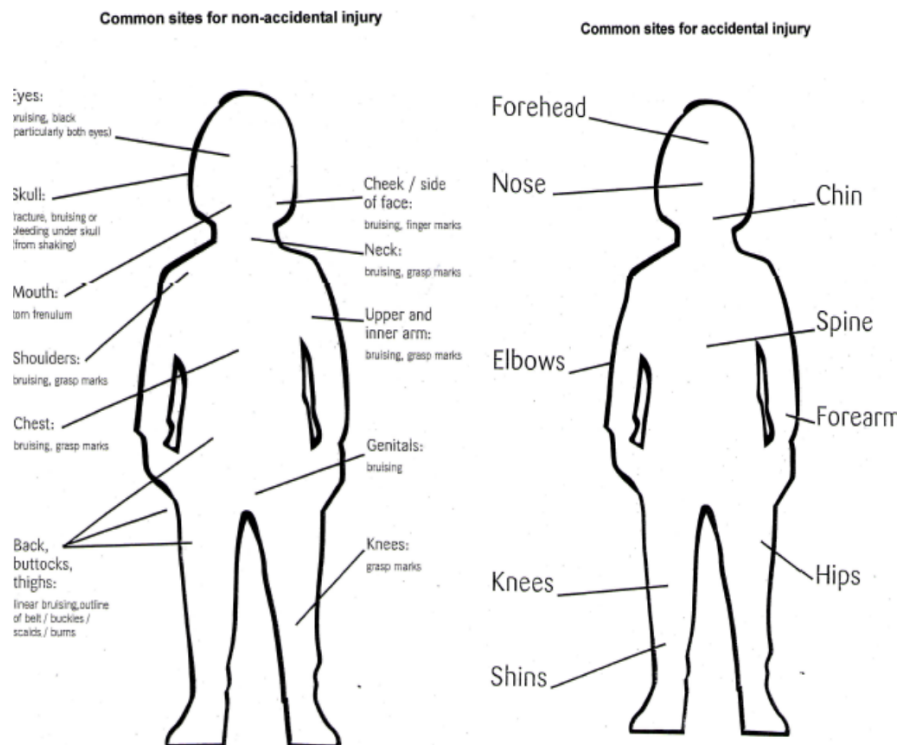
**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Appendix 9



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### **Appendix 10**

#### **Code of Conduct Summary: Safer Working Practice for Staff**

For further details refer to:

- *Code of Conduct for Staff' Revised September 2023*
- *ICT Code of Practice for Teachers and Adults*

#### **Underpinning Principles**

Staff should:

- Be aware that the welfare of the child is paramount
- Understand their responsibilities to safeguard and protect children and young people.
- Be responsible for their own actions and behaviour, and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Work, and be seen to work, in an open and transparent way.
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
- Apply the same professional standards regardless of age, disability, race, colour, ethnic or national origin, gender, religion and belief, sexual orientation, marital status or trade union membership.
- Report concerns or take advice immediately from their DSL/DDSL over any incident which may give rise to concern.
- Be familiar with local child protection arrangements



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- Know the name of the DSL/DDSLs and action to be taken in the event of a concern regarding the welfare of a child
- Follow the Staff Code of Conduct policy and ICT Code of Practice