Child Protection and Safeguarding Policy

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Approved by:	Terence Breen
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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding Lead	Cheryl Dudey	CherylDudey@impacteducation.org.uk 0121 502 2645
DDSL SENCO	Josephine Houlston	Josie.houlston@impacteducation.org.uk 0121 502 2645
DDSL	Amie Hazel	Amie.h@impacteducation.org.uk **0121 502 2645**
DDSL Attendance and welfare officer	Ellease Burke	Elleaseburke@impacteducation.org.uk 0121 5022645
Local authority designated officer (LADO)	sandwell_lado@sandwellchildrenstrust.org Dudley- Yvonne Nelson-Brown and Sukhchandan Kaur	0121 569 4770/4771 01384 813110 01384813066
Channel helpline		020 7340 7264
PREVENT	Mark Wilson	Dudley Local authority

1. Aims

The school aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare.

All staff are aware of their statutory responsibilities with respect to safeguarding.

Staff are properly training in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

"This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (KCSIE) 2026, which came into force on 1 September 2026, and Working Together to Safeguard Children (2023

and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

Guidance for safer working practice (2022)

Domestic abuse act 2023 Which outlines the objectives, understanding, recognition, Impact, differing experiences of domestic abuse and the response required.

Inspecting safeguarding in early years/schools and skills.

Behaviour in schools, searching, screening, confiscation guidance July 22

Working together to improve attendance 2024 Guidance to support schools and local authorities to maintain high levels of school attendance.

This policy is also based on the following legislation:

Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

3. Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- *Providing help and support to meet the needs of children as soon as problems emerge.*
- *Protecting children from maltreatment, whether that is within or outside the home, including online.*
- *Preventing the impairment of children's mental and physical health or development ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.*

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

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

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

Sharing of nudes and semi-nudes (also known as, sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams.

Children includes everyone under the age of 18.

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

The local authority (LA)

A clinical commissioning group for an area within the LA

The chief officer of police for a police area in the LA area

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

Have special educational needs (SEN) or disabilities or health conditions (see section 10)

Are young carers.

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Have English as an additional language.

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.

Are asylum seekers

Are at risk due to either their own or a family member's mental health needs.

Are looked after or previously looked after (see section 12)

Are missing from education.

Whose parent/carer has expressed an intention to remove them from school to be home educated.

Children who are Gender Questioning

The school recognises that children who are questioning their gender may experience additional vulnerability and safeguarding risks.

Decisions regarding support will be made on an individual basis, considering the child's welfare, wishes, parental involvement, professional advice and safeguarding needs

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff, regardless of role, will read and understand Part One of Keeping Children Safe in Education 2026 in full.

The school will ensure that all staff receive safeguarding updates at least annually and whenever significant safeguarding developments arise.

Staff will sign an annual declaration confirming they have read and understood Part One of KCSIE 2026 and have received appropriate safeguarding training

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the staff [behaviour policy/code of conduct], the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, and the safeguarding response to children who go missing from education.

The Family help process Any child may benefit from Family help, but all school and college staff should be particularly alert to the potential need for Family help for a child who:

is disabled or has certain health conditions and has specific additional needs

has special educational needs (whether they have or not a statutory Education, Health and Care plan)

- has a mental health need
- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a family parent or carer in custody, or is affected by parental offending (reworded from prison)
- is in a family circumstance presenting challenges for the child, such as drug
- and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

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

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Cheryl Dudey and Deputies DSLs are , Amie Hazel, Josephine Houlston SENCO and Ellease Burke Attendance and wellbeing officer.

The DSL takes lead responsibility for child protection and wider safeguarding in the school to include leading on filtering and monitoring of technology in the school setting supported by MINT.

During term time, the DSL will be available during school hours for staff and local authorities to discuss any safeguarding concerns. Contact can be made through Impact's enquiry line on the website which is monitored daily

To contact Cheryl Dudey DSL

0121 502 2645

CherylDudey@impacteducation.org.uk

To contact Amie Hazel DDSL

0121 502 2645

Amie.h@impacteducation.org.uk

When the DSL is absent, the Head Teacher, Jayne Whitehouse, will be available for any child protection or safeguarding concerns jaynewhitehouse@impacteducation.org.uk 0121 5022645

If the DSL and [deputy/deputies] are not available, the Executive Head Terrence Breen- terrybreen@impacteducation.org.uk-] will act as cover (for example, during out-of-hours/out-of-term activities).

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

Provide advice and support to other staff on child welfare and child protection matters.

Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.

Contribute to the assessment of children.

Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

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

The full responsibilities of the DSL and [deputy/deputies] are set out in their job description.

5.4 The Executive Headteacher

The Executive Headteacher is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

Communicating this policy to parents/carers when their child joins the school and via the school website.

Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.

Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

Timely information sharing is essential to effective safeguarding.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and acting

Staff and volunteers must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

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

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

https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

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

Listen to and believe them. Allow them time to talk freely and do not ask leading questions.

Stay calm and do not show that you are shocked or upset.

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Use CPOMS to record notes as soon as possible afterwards, using the words that the child has used.

Ensure all information is factual do not record your assumptions and interpretations, just what you heard and saw.

Do not destroy any original notes you may have made.

Do not ask a child to write an account or sign any of your documentation as this may compromise enquiries that need to be made later by children's social care or Police.

All safeguarding concerns or records need to be added to CPOMS before the end of the working day.

7.3 If you discover that FGM has taken place, or a pupil is at risk of FGM.

Keeping Children Safe in Education explains that female genital mutilation (FGM) comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

Staff are required to report Known cases of FGM to the police on 101 (Non-emergency) - Staff have a personal duty and this cannot be transferred to anyone else.

Failure to report is not a criminal offence but may lead to disciplinary procedures.

Contextual safeguarding also now known as extra Familial safeguarding.
Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual or Extra Familial safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare including sexual and criminal exploitation.

Children potentially at greater risk of harm Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Family help

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

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

Early help contacts for Sandwell.

For more information about Family Help, please email: ecaf_queries@sandwell.gov.uk

For advice and guidance, contact your local Community Operating Group (COG):
Oldbury - 0121 569 7295

Rowley - 0121 569 7296

Smethwick - 0121 569 7297

Tipton - 0121 569 7291

Wednesbury - 0121 569 7294

West Bromwich - 0121 569 7292

Family help Dudley

Contact -01384 81439

If you require further information about Family Help or need support in completing an assessment, please contact the respective Family Centre. Please complete the Family Help Assessment using the Dudley Children's Portal site.

Stourbridge Family Centre - Forge Rd, Stourbridge, DY8 1XF, 01384 818780, fs.stourbridge@dudley.gov.uk

Halesowen Family Centre - Lye By-Pass, Stourbridge, DY9 8HT, 01384 813954, fs.halesowen@dudley.gov.uk

Brierley Hill Family Centre - 18 Parkes Street, Brierley Hill, DY5 3DY, 01384 813322, fs.brierleyhill@dudley.gov.uk

Dudley North Family Centre - Bayer Street, Bilston, WV14 9DS, 01384 813096, fs.dudleynorth@dudley.gov.uk

Dudley Central Family Centre - Selbourne Road, Dudley DY2 8LJ, 01384 812440, fs.dudley@dudley.gov.uk

Family help Walsall

Family Help, Civic Centre, Darwall Street, Walsall, WS1 1TP

0300 555 2866

Family Help Wolverhampton.

www.wolverhamptonsafeguarding.org.uk 01902 550477

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

A multi-agency referral from should be completed immediately.

Impact independent school liaises with the following local authorities' referrals are made to the relevant local authority dependant on the address of the young person.

Contact details for each multi agency safeguarding hub are.

Dudley MASH

03005550050
Out of hours duty team 03305558574

Sandwell MASH

0121 569 3100.

Walsall MASH

0300 555 2866 (out of hours - 0300 555 2922)

Wolverhampton MASH

01902 550477

NSPCC Helpline

0808 800 5000

7.5 If you have concerns about extremism

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

If, in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

Think someone is in immediate danger.

Think someone may be planning to travel to join an extremist group.

See or hear something that may be terrorist related.

7.6 If you have a mental health concern

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

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

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

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

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

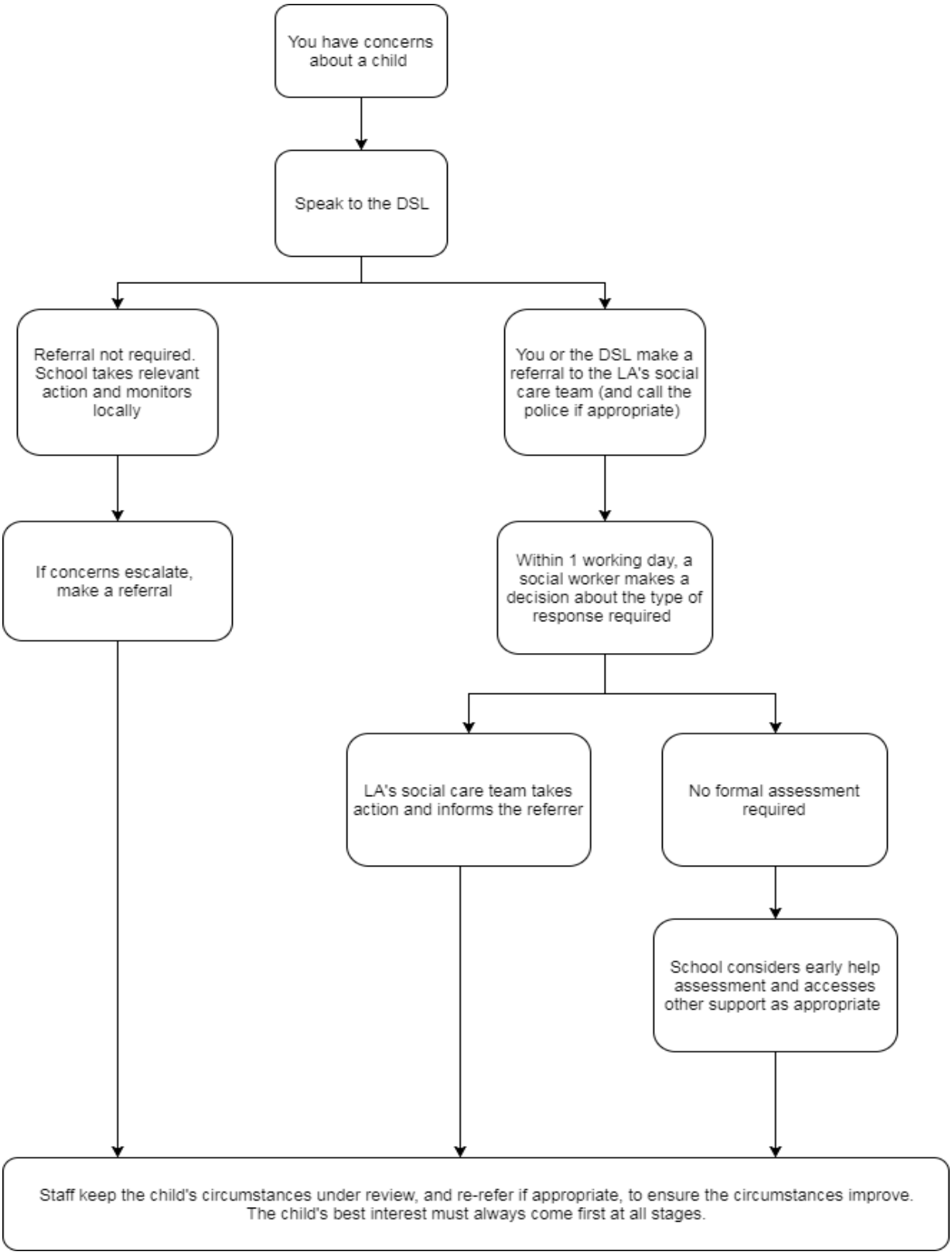
Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

We at Impact access a range of support to help us identify children in need of extra mental health support; this includes working with external agencies, 1-1 mentoring and a robust pastoral support package. More information can be found in the mental health and behaviour in schools' guidance, we also follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among young people.

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the Link Programme. Training for senior mental health leads, will be available to all state funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health. At Impact we have a designated Mental Health champion, and this person is the DSL Cheryl Dudey.

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

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



7.7 Concerns about a staff member, supply teacher, volunteer, or contractor

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If you have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, speak to the Executive Headteacher as soon as possible. If the concerns/allegations are about the Executive Headteacher, speak to the proprietor. Where the Executive Headteacher is also the proprietor, speak to the DSL. Or report it directly to the local authority designated officer (LADO

The Executive Headteacher or DSL will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor) to the Executive Headteacher, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other pupils.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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

Most cases of pupils hurting other pupils will be dealt with under keeping children safe in education part 5 or the NSPCC Hackett Continuum, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes) If a pupil is worried or concerned about any of the above there is a safe space for them to have a conversation **shorespace.org.uk**

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse.

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

You must record the allegation and tell the DSL, but do not investigate it.

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.

Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.

Ensure our curriculum helps to educate pupils about appropriate behaviour, consent, and safeguarding.

Ensure pupils can easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

Ensure staff reassure victims that they are being taken seriously.

Ensure staff are trained to understand:

Ensure all incidents are logged on CPOMS and assigned to relevant staff on the behaviour and pastoral team. Each individual incident is followed up and interventions are put in place to address topics with individuals and are implemented into the curriculum.

Support, education, and interventions are also provided via external agencies.

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
- That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they must play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.

Violence Against Women and Girls (VAWG)

The school acknowledges the increased national concern regarding Violence Against Women and Girls (VAWG), misogyny and harmful gender-based attitudes.

Staff will challenge inappropriate language, sexist attitudes and harmful behaviours at the earliest opportunity.

The curriculum will promote respectful relationships, equality and positive behaviours towards all members of the community

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident.

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

Delete the imagery or ask the pupil to delete it.

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.

Say or do anything to blame or shame any young people involved.

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to pupil(s)

If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment.

If there is a need to contact another school, college, setting or individual.

Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

The incident involves an adult.

There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13.

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Executive Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through community police officer - a.peters@west-midlands.pnn.police.uk Dudley

hubert.treasurembe@westmidlands.police.uk Sandwell

Or the DSL will/can complete a FIB form, this is sent to a monitored email box at West Midlands police.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE curriculum and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.

Issues of legality

The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images.

The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for pupils to confidently report abuse.

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.

Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Students are made aware of reporting procedures during induction process and information on who to report to is displayed around site at Impact.

A student friendly disclosure guide is available in classrooms and around school to give students a clear understanding of how to disclose and to who.

8. Online safety, the use of mobile technology, safe use of AI and filtering & monitoring

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

Make sure all staff are trained on induction and parents and carers are made aware of websites, children's access and in the event contacts child online parents are informed which member of staff will be in contact.

Have robust processes in place to ensure the online safety of pupils, staff, volunteers, and visitors.

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community.

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Impact students are searched upon entry into the building Mobile phones are stored safely and not permitted for use on site by students at impact.

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

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

Please view the link bellow, this will provide support in keeping our students / staff and school safe online.

The DSL Cheryl Dudey is the lead on filtering and monitoring and is responsible for monitoring data and updating the online risk assessment annually. Also to be mindful of the risks associated with the use of AI in our school. Our filtering and monitoring through MINT is robust and secure.

2023 Appropriate filtering and monitoring definitions published - UK Safer Internet Centre

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present.

Mobile Phone Expectations

The school has clear expectations regarding the use of mobile phones and internet-enabled devices.

Staff and pupils will be educated regarding risks associated with:

- Image sharing
- Social media misuse
- Deepfake technology
- Cyberbullying
- Online exploitation
- AI-generated content

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

Make all pupils, parents/carers, staff, volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on Behaviour ,searching, screening and confiscation

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community Findings and actions arising from reviews will be recorded and reported to the Proprietor as appropriate.

The **2025** guidance adds disinformation, misinformation and conspiracy theories to the list of content risks under online safety. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023)

Artificial Intelligence and Emerging Technologies

The school recognises the safeguarding risks associated with artificial intelligence (AI), generative AI platforms, deepfake technology and image manipulation applications.

Staff will remain vigilant to:

- AI-generated indecent images
- Deepfake and manipulated content
- Online impersonation
- Technology-facilitated abuse
- AI-generated bullying and harassment
- The misuse of AI to facilitate exploitation, grooming or harmful content creation.

Concerns involving AI-generated images or online abuse will be treated as safeguarding concerns and responded to in accordance with this policy.

9. Notifying parents or carers

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

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

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

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

10. Pupils with special educational needs, disabilities, or health issues

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

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

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.

The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

Communication barriers and difficulties in managing or reporting these challenges.

We offer extra pastoral support for these pupils. This includes:

Support with learning with one-to-one support from our SEN coordinator.

One to one support from a member of the safeguarding and behaviour team who can collaboratively work with external agencies for students to be able to access extra support.

To include

CAMHS

DECCA/HERE4YOUTH

FORWARD THINKING

KALIEDASCOPE

MURRAY HALL

BARNADOES

KRUNCH

PHASE TRUST

THE WHAT CENTRE

11. Pupils with a social worker

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

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

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks.

The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

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

Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The DSL has details of children's social workers and relevant virtual school heads.

As part of their role, they will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children.

The role of the virtual school head was extended in March 2024. It now includes a non-statutory responsibility to promote the educational achievement of all children in kinship care. This would include children subject to special guardianship orders and child arrangement orders, not just children under care orders

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

Please see complaints policy

Complaints policy-Impact independent school

13.3 Whistleblowing

Please refer to whistle blowing policy

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved.

A note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

Records are kept electronically, and some are paper based.

Records are kept on the CPOMS system, and some are also kept in the child's file in a locked cabinet.

Records are kept confidential and are only shared through secure means.

Concerns and referrals are kept in the child's safeguarding file.

Safeguarding records relating to individual children will be retained in line with UKGDPR and stored securely until the child reaches the age of 25 years if we are the last educational setting.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, code of conduct and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

Be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.

Be in line with advice from the 3 safeguarding partners.

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment.
- Have a clear understanding of the needs of all pupils.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, advice, and guidance.

15.2 The DSL and [deputy/deputies]

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, DSL forums, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Recruitment – interview panels

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

See appendix 2 of this policy for more information about our safer recruitment procedures.

15.4 Staff who have contact with pupils and families.

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

16. Monitoring arrangements

This policy will be reviewed **annually** by. At every review, the Executive Headteacher Terrence Breen will approve the policy.

17. Links with other policies

This policy links to the following policies and procedures:

Behaviour

Staff behaviour/code of conduct

Complaints

Health and safety

Attendance

Online safety

Mobile phone use

Equality

Relationships and sex education

First aid

Curriculum

Designated teacher for looked-after and previously looked-after children.

Privacy notices

Whistle blowing

Anti-bullying

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect and exploitation safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap, understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

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

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

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

Seeing or hearing the ill-treatment of another

Bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 caregivers)

Ensure access to appropriate medical care or treatment

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

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

Our school's commitment to safeguarding and promoting the welfare of children.

That safeguarding checks will be undertaken.

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

Consider any inconsistencies and look for gaps in employment and reasons given for them.

Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- We will also carry out online searches of social media sites which will include face book, Instagram, Twitter and snapchat and the information will be stored and recorded according to Data protection and UKGDPR.

Sign a declaration confirming the information they have provided is true.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

Not accept open references

Liaise directly with referees and verify any information contained within references with the referees.

Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Executive Headteacher/principal as accurate in respect to disciplinary investigations.

Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.

Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.

Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.

Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.

Explore any potential areas of concern to determine the candidate's suitability to work with children.

Record all information considered and decisions made.

Pre-appointment vetting checks

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

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

Verify their identity.

Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision made.

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.

Verify their mental and physical fitness to carry out their work responsibilities.

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.

Verify their professional qualifications, as appropriate.

Ensure they are not subject to a prohibition order if they are employed to be a teacher.

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

Check that candidate taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

* Management positions are most likely to include, but are not limited to, Executive Headteachers, principals and deputy/assistant headteachers.

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

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

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances, we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

There are concerns about an existing member of staff's suitability to work with children; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

We believe the individual has engaged in relevant conduct; or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity.

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

All proprietors will also have the following checks:

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK.

Staff working in alternative provision settings

As an alternative provider, it is extremely rare that we would place a child in another alternative provider placement, however, there may be times when this is necessary and in the best interests of the learner. Where we do place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised due to the regulated activity.

Pupils staying with host families

Where the school arranges for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold.

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

Behaved in a way that has harmed a child, or may have harmed a child, and/or

Possibly committed a criminal offence against or related to a child, and/or

Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

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

A 'case manager' will lead any investigation. This will be the Executive Headteacher who is also the proprietor] where they are the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved.

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

Redeployment within the school so that the individual does not have direct contact with the child or children concerned.

Providing an assistant to be present when the individual has contact with children.

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

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

Procedure for dealing with allegations.

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.

Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.

If immediate suspension is considered necessary, agree, and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

If it is decided that no further action is to be taken regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable).

The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution.

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated.

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension.

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending the school.

Unsubstantiated, unfounded, false, or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false, or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police, and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared?

- How to manage speculation, leaks, and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record Keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated, or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated, or malicious.

Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold, set out in section 1 above.

Concerns may arise through, for example:

Suspicion

Complaint

Disclosure made by a child, parent, or other adult within or outside the school.

Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children. We at Impact understand that children are not always ready or able to talk about their experiences of abuse.

All students at impact

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

Using inappropriate sexualised, intimidating, or offensive language

Sharing low-level concerns

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

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

Empowering staff to share any low-level concerns as per section 7.7 of this policy.

Empowering staff to self-refer.

Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.

Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.

Helping to identify any weakness in the school's safeguarding system.

At Impact, children's wellbeing is at the heart of getting it right for every child. This means focusing on the wellbeing of every child to ensure they are safe, healthy, achieving, nurtured, active, respected, responsible, and included.

Relationships staff build with students are paramount in creating an open culture.

Staff are always on hand with open door policies to speak with students and address any concerns.

Responding to low-level concerns

If the concern is raised via a third party, the Executive Headteacher or DSL will collect evidence where necessary by speaking:

Directly to the person who raised the concern, unless it has been raised anonymously.

To the individual involved and any witnesses

The Executive Headteacher or DSL will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy/code of conduct].

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

Kept confidential, held securely, and comply with the DPA 2018 and UKGDPR

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.

Retained at least until the individual's employment at the school comes to an end.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Children absent from education.

A child who is absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse, neglect such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. All staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education,

There are many circumstances where a child may become absent from education, but some children are particularly at risk. These include children who:

Are at risk of harm or neglect.

Are at risk of forced marriage or FGM.

Come from Gypsy, Roma, or Traveller families.

Come from the families of service personnel.

Go missing or run away from home or care.

Are supervised by the youth justice system.

Cease to attend a school.

Come from new migrant families.

Impact staff are aware of how to follow procedures for unauthorised absence and for dealing with children who go absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member of Impacts staff suspects that a child is suffering from harm or neglect, they should follow Impact's child protection policy procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

We will ensure that students who are expected to attend Impact but fail will be referred to relevant authorities.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

Appearing with unexplained gifts or new possessions

Associating with other young people involved in exploitation.

Suffering from changes in emotional wellbeing

Misusing drugs and alcohol

Going missing for periods of time or regularly coming home late

Regularly absent from school or education

Not taking part in education

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

Child sexual exploitation

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

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

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

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

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

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

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

Domestic abuse

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

If a child witnesses domestic abuse, including where they see, hear or experience its effects. they are also recognised as the victim.

Types of domestic abuse include intimate partner violence, can be psychological, physical. Sexual, financial, emotional, coercive, and controlling behaviour, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police or local authority will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

All Impact staff receive training on domestic violence.

Sandwell Children's Safeguarding Partnership (SCSP) and Dudley's safeguarding people's partnership DSPP operate Operation Encompass that is a police and education early intervention safeguarding partnership that supports children and young people exposed to Domestic Abuse (including controlling behaviour and coercive control). It aims to ensure schools are notified in a timely manner of any Domestic Abuse incident where child/ren are present or registered at the address.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/

http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

A pupil confiding in a professional that FGM has taken place.

A mother/family member disclosing that FGM has been carried out.

A family/pupil already being known to social services in relation to other safeguarding issues.

A girl: Having difficulty walking, sitting or standing, or looking uncomfortable

Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin.

A parent or family member expressing concern that FGM may be carried out.

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage.

Forcing a person into marriage is a crime. A forced marriage is one entered 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 a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

Speak to the pupil about the concerns in a secure and private place.

Activate the local safeguarding procedures and refer the case to the local authority's designated officer.

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

Radicalisation is the process of a person legitimising for, or use of, terrorist violence. Children may be susceptible to radicalisation into terrorism.

Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Note: This preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

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

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

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

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

Refusal to engage with, or becoming abusive to, peers who are different from themselves.

Becoming susceptible to conspiracy theories and feelings of persecution

Changes in friendship groups and appearance

Rejecting activities, they used to enjoy.

Converting to a new religion

Isolating themselves from family and friends

Talking as if from a scripted speech

An unwillingness or inability to discuss their views.

A sudden disrespectful attitude towards others

Increased levels of anger

Increased secretiveness, especially around internet use

Expressions of sympathy for extremist ideologies and groups, or justification of their actions

Accessing extremist material online, including on Facebook or Twitter

Possessing extremist literature

Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

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

Staff should **always** act if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including.

Child-on-Child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Impact independent school recognises that all children are capable of abusing their peers and this will not be tolerated.

Child-on-Child abuse is most likely to include, but may not be limited to:

Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

Abuse in intimate personal relationships between peers

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Consensual and non-consensual sharing of nudes and semi nude's images and/or videos (also known as sexting or youth produced sexual imagery)

Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child -on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

Between 2 children of any age and sex

Through a group of children sexually assaulting or sexually harassing a single child or group of children

Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBTQ) children are at greater risk.

School recognises that LGBTQ children can be a target of abuse by other children and require a safe space and trusted adult they can go to in school.

Staff should be aware of the importance of:

Challenging inappropriate behaviours

Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Further guidance and advice can be found here

Sexual violence and harassment between children in schools and colleges

Serious violence

Indicators that may signal that a child is at risk from, or involved with, serious violent crime may include:

Increased absence from school

Change in friendships or relationships with older individuals or groups.

Significant decline in performance

Signs of self-harm or a significant change in wellbeing

Signs of assault or unexplained injuries

Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors that increase the likelihood of involvement in serious violence include:

Being male

Having been frequently absent or permanently excluded from school.

Having experienced child maltreatment

Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Assessment of risk outside the family home (formerly Contextual Safeguarding)

Safeguarding incidents and/or behaviours can be associated with factors outside of Impact independent school and/or can occur between children outside the school. All staff, but especially the DSL, should consider the context within which such incidents and/or behaviours occur.

This is known as 'Assessment of risk outside the family home', which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. By providing this information, to children's social care, as part of the referral process, assessments can then consider all the available evidence and the full context of any abuse. Additional information is available here: https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding

Child Criminal Exploitation: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".' Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Children with a social worker

At Impact independent school, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This could mean that they are more vulnerable to further harm, as well as facing barriers to attendance, learning, behaviour, and poor mental health.

Impact independent school will support students with a social worker by monitoring their attendance and meet with other agencies and key professionals.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to Impact will be met by the relevant member of staff.

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

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

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

Non-collection of children

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

Contact parent/carer.

Contact other emergency contacts on student's profile.

Contact key professionals if child is subject to a plan.

Missing pupils

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

Contact parents/carers immediately.

Attend a home visit if necessary.

Report child missing to the police.

Please see absconding policy for further guidance

Absconding policy- Impact independent school

COVID19

COVID-19 Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19). The department has issued non-statutory interim guidance on safeguarding in schools, colleges, and other providers during the coronavirus outbreak. This guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads to continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider safeguarding policy and process differently when compared to business as usual.
As it is the Government's plan that all pupils, in all year groups, will return to school fulltime from the beginning of the 2020 autumn term, we have full regard for the Government's Guidance for full opening: schools and in particular the section on safeguarding. 5 We are aware that pupils may be experiencing a variety of emotions in response to the coronavirus (COVID-19) outbreak, such as anxiety, stress, or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers. All staff members and volunteers will be vigilant about the possible impacts of the pandemic on pupils' mental wellbeing and act immediately on any safeguarding concerns, including new concerns where children are returning, and share their concerns with designated and deputy designated safeguarding leads. We will put in place appropriate support systems for pupils and parents/ carers, including working

with and/or referral to relevant outside agencies. We note the Government's COVID-19: guidance on supporting children and young people's mental health and wellbeing. We are aware of the continued importance for our staff to work with and support children's social workers, the local authority virtual school head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners during this period.

Education at home

Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: safeguarding-in-schools-college sand-other-providers and safeguarding-and-remote-education.
We will continue to ensure that arrangements are in place to keep children not physically attending the school safe, especially online. Where we identify a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, we will ensure that a robust communication plan is in place for that child or young person. Details of this plan will be recorded appropriately as will a record of contact. All our staff who interact with children, including online, will continue to look out for signs a child may be at risk. Any such concerns will be dealt with as per this policy and where appropriate, referrals will continue to be made to relevant agencies.

Remote Learning

Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC and PSHE Association also provide helpful advice: • NSPCC Learning - Undertaking remote teaching safely during school closures • PSHE - PSHE Association coronavirus hub.