



BATH & WELLS  
Multi Academy Trust

'That they may have life, life in all its fullness' John 10:10

## Child Protection and Safeguarding Policy

### Bathwick St. Mary Church School



**Approved by:** Bath & Wells Multi Academy Trust  
Board

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Chair of Trustees

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# 1 Our strong safeguarding culture

## 1.1 Why it is important

- 1.1.1 Safeguarding is everyone's responsibility and it is the duty of the school to safeguard and promote the welfare of children. This is our core safeguarding principle.
- 1.1.2 In adhering to this principle we focus on providing a safe and welcoming environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All of our children have equal rights to support and protection.
- 1.1.3 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers and trustees and governors, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law and guidance and best practice.
- 1.1.4 This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

## 1.2 What it means for our pupils

- 1.2.1 We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of **early help** when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.
- 1.2.2 All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issue will receive appropriate support.
- 1.2.3 Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.
- 1.2.4 Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse.
- 1.2.5 All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

## 2 Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2021)
- Working Together to Safeguarding Children (2018)
- What to do if you're worried a child is being abused (2015)
- The Teacher Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021

## 3 Roles and responsibilities

The Designated Safeguarding Lead (DSL) is: Kevin Purkiss

Contact details: email: [office@bm.bwmat.org](mailto:office@bm.bwmat.org) Tel: 01225 465654

The deputy DSL(s) is: Duncan Jackson

Contact details: email: [office@bm.bwmat.org](mailto:office@bm.bwmat.org) Tel: 01225 465654

The safeguarding governor is: Ben Jenkins

Contact details: email: [ben.jenkins@bm.bwmat.org](mailto:ben.jenkins@bm.bwmat.org) Tel: 01225 465654

The headteacher is: Kevin Purkiss

Contact details: email: [office@bm.bwmat.org](mailto:office@bm.bwmat.org) Tel: 01225 465654

### 3.1 The Designated Safeguarding Lead (DSL):

3.1.1 The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety) in the academy/trust. The DSL duties include:

- ensuring child protection policies are known, understood and used appropriately by staff

- working with the board of trustees [and local governing committee] to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly
- acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters
- acting as a point of contact with the three safeguarding partners
- making and managing referrals to children's social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaising with the "case manager" and the designated officer(s) at the local authority if allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child's new school

### 3.2 The deputy Designated Safeguarding Lead(s):

- 3.2.1 Our Deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day to day basis. The ultimate lead responsibility for child protection remains with the DSL.

### 3.3 The safeguarding governor

- 3.3.1 The role of the safeguarding governor is to provide support and challenge to the DSL and the leadership of the academy/trust on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 2021
- supporting and challenging the DSL on the standards of safeguarding at the academy/trust
- confirming that consistent and compliant safeguarding practice takes place across the academy/trust
- reporting to the board of trustees about the standard of safeguarding in the academy/trust

- 3.4 The DSL and the safeguarding governor meet on a regular basis (usually once a fortnight) to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the school. There are also two formal annual meetings dedicated to a full review of all safeguarding procedures and practices.



## 4 Children who may be particularly vulnerable

Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our pupils receive equal protection, we give special consideration to children who:

- are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality
- are vulnerable to being bullied, or engaging in bullying
- are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism
- live in chaotic or unsupportive home situations
- live transient lifestyles or live away from home or in temporary accommodation
- are affected by parental substance abuse, domestic violence or parental mental health needs
- do not have English as a first language

## 5 Children with special educational needs and disabilities

5.1 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

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

5.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

## 6 Children missing education

6.1 Children missing education, particularly repeatedly, can be an indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

6.2 We closely monitor attendance, absence and exclusions and our DSL will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day.

## 7 Mental health

7.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils. The School's lead in Mental Health is Ellie McHugh.

7.2 All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

7.3 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy.

## 8 Peer on peer abuse

8.1 Peer on peer abuse - children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is more likely that boys will be perpetrators of peer on peer abuse and girls victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

8.2 All staff should be clear about the school's policy and procedures for addressing peer on peer abuse.

8.3 Peer on peer abuse can take many forms, including:

- **physical abuse** such as shaking, hitting, biting, kicking or hair pulling
- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying
- **sexual violence and harassment** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes
- **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
- **upskirting**, which involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)** including pressuring others to share sexual content
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- **initiation/hazing** - used to induct newcomers into sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond

8.4 Different gender issues can be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

8.5 All staff recognise that that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place but is not being reported.

8.6 Minimising risk

8.6.1 We take the following steps to minimise or prevent the risk of peer on peer abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries
- Using assemblies to outline acceptable and unacceptable behaviour
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs and other suitable activities
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.

8.7 Investigating allegations



8.7.1 All allegations of peer on peer abuse should be passed to the DSL immediately who will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Recorded** - all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the school's child protection and safeguarding systems and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome. These should be completed on body maps to show the exact nature of the concern.

8.7.2 Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2021.

8.7.3 Children can report allegations or concerns of peer on peer abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse: Verbal or non verbal signals are developed in each class to give children confidence to share concerns. In addition, each class has a 'worry box' or equivalent way of leaving adults a message if children want to share in an alternative way.

## 8.8 Supporting those involved

8.8.1 The support required for the pupil who has been harmed will depend on their particular circumstance and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work.

8.8.2 Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

## 9 Serious violence

9.1 All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

9.2 All staff are made be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.



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

10.1 Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:

- Age
- Gender
- Sexual identity
- Cognitive ability
- Physical strength
- Status
- Access to economic or other resources

10.2 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

### 10.3 Child Criminal Exploitation (CCE)

10.3.1 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

10.3.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

10.3.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

10.3.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### 10.4 CCE Indicators

10.4.1 CCE indicators can include children who:

10.4.2 appear with unexplained gifts or new possessions

10.4.3 associate with other young people involved in exploitation

10.4.4 suffer from changes in emotional well-being

10.4.5 misuse drugs or alcohol

10.4.6 go missing for periods of time or regular return home late



10.4.7 regularly miss school or education or do not take part in education

## 10.5 Child Sexual Exploitation (CSE)

10.5.1 CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

10.5.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

10.5.3 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

10.5.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

## 10.6 CSE Indicators

The above indicators can also be indicators of CSE, as can children who:

- have older boyfriends
- suffer sexually transmitted infections or become pregnant

10.7 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

10.8 Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.

10.9 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

## 11 County Lines

11.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

11.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 10.1 of this policy.

11.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 10.4 of this policy, with the main indicator being missing episodes from home and/or school.



11.4 Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation with which they have no connection or in a hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

11.5 All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

## 12 Sharing nudes and semi-nudes

12.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.

12.2 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.

12.3 The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

12.4 All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm we will refer the matter to the police and/or children's social care.

12.5 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 - [UKCIS advice 2020](#) . The school will have regard to this advice when managing these issues.

## 13 Online safety

13.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk.

13.2 Online safety risks can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **Contact:** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.

13.3 All staff are aware of these risk areas and should report any concerns to the DSL.

## 14 Domestic abuse

14.1 The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

14.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.

14.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

14.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

14.5 Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child.

14.6 All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.



## 15 Honour-Based abuse

15.1 So-called 'honour-based' abuse (HBA) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.

15.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.

15.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

### 15.4 Female Genital Mutilation

15.4.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

15.4.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.

### 15.5 Forced Marriage

15.5.1 A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse. Forced marriage is illegal.

15.5.2 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

15.5.3 Forced marriage is not the same as arranged marriage, which is common in many cultures.

15.5.4 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

## 16 Radicalisation and Extremism

16.1 Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

16.2 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

16.3 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.



## 17 Staff/pupil relationships

- 17.1 Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18.
- 17.2 We provide our staff with advice regarding their personal online activity and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.
- 17.3 Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

## 18 Allegations and concerns raised in relation to staff, supply staff, contractors and volunteers including governors and Trustees

- 18.1 If an allegation is made against a member of staff, including supply staff, contractor or a volunteer, our set procedures must be followed. Our allegations and concerns raised in relation to staff, supply staff, contractors and volunteers policy and procedure can be accessed here [\[link\]](#) and the full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2021.

Our school has clear procedures for dealing with allegations against staff. If a concern is raised about the practice or behaviour of a member of staff this information should be reported straight away and passed to the Headteacher [\[add name of Headteacher\]](#).

In the absence of the Headteacher or if the allegation is against the Headteacher, the person receiving the allegation will contact the Local Authority Designated Officer (LADO) or Chair of Governors directly.

An allegation, in the context of the statutory obligations or organisations relates to any individual who works or volunteers in any capacity with children and where there is a concern that this person has or may have:

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

In all cases where the concern about an individual falls into one of the categories above, which does meet the harm threshold, this will be considered to be an allegation. In all such cases the allegation must be reported to the LADO as soon as possible, but must be within 24 hours.

- 18.2 The school will also respond to low-level concerns that do not meet the harm threshold. The term 'low-level' concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' 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 LADO. (KCSIE para 409)

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

- Being over 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;  
or
- Using inappropriate sexualised, intimidating or offensive language (KCSIE para 410)

18.3 Any low-level concern must be reported to the DSL, recorded in writing by the DSL and dealt with appropriately. Where a low-level concern is raised about the DSL, it should be shared with the Headteacher. The record should include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted, unless they wish to remain anonymous. Staff records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where this is identified, the school will decide on a course of action, either through its disciplinary procedures or where it moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

18.4 Allegations made against staff who no longer work at the school will be reported to the police.

## 19 The Role of the LADO

19.1 The LADO is responsible for:

- Providing advice, information, and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and social care.

**LADO Contact Details:** 01225 396197

## 20 Whistle blowing if you have concerns about a colleague

20.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the headteacher, unless the complaint is about the headteacher, in which case concern should be reported to the chair of governors.

20.2 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

20.3 The school's whistleblowing code [\[link\]](#) allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

## 21 Staff training

21.1 Our staff receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils. All training is accessed through Edcare, Local Authorities and through attendance at Trust DSL training and networks.

21.2 New staff, governors and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our Designated Safeguarding Lead and deputy DSLs.

## 22 Safer Recruitment

22.1.1 The governing body and our senior leadership team are responsible for ensuring we follow recruitment procedures that help to deter, reject or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications and work history in accordance with Keeping Children Safe in Education 2021 and the local safeguarding partner arrangements.

22.1.2 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

22.1.3 We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and requests DBS checks where required by Keeping Children Safe in Education 2021. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

22.1.4 When using supply staff, we will obtain written confirmation from supply agencies or third party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

22.1.5 The school maintains a single central record of recruitment checks undertaken. Our recruitment policy and procedures can be accessed here [\[link\]](#).

## 23 Site security

Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times linked to a risk assessment. All visitors will be given guidance highlighting safeguarding arrangements on site.

## 24 Child protection procedures

24.1 Recognising abuse



24.1.1 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

24.1.2 Keeping Children Safe in Education 2021 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

#### 24.2 Taking action

24.2.1 Any child could become a victim of abuse. Key points for staff to remember for taking action are:

24.2.2 in an emergency take the action necessary to help the child, if necessary call 999

24.2.3 complete a record of concern form and report your concern to the DSL as soon as possible

24.2.4 share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family

#### 24.3 If you are concerned about a pupil's welfare

24.3.1 Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.

24.3.2 If the pupil does reveal that they are being harmed, staff should follow the advice below.

#### 24.4 If a pupil discloses to you

If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- remain calm and not overreact
- allow them to speak freely
- not be afraid of silences
- not ask investigative questions
- give reassuring nods or words of comfort - 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not automatically offer physical touch as comfort
- let the pupil know that in order to help them they must pass the information on to the DSL
- tell the pupil what will happen next
- complete the **concern form** and pass it to the DSL as soon as possible
- report verbally to the DSL even if the child has promised to do it by themselves

#### 24.5 Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

## 25 Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase

the risk to the child. The Bath and North East Somerset Duty Team can be contacted on 01225 615165. In addition, the school's link Social Worker is Pamela Chambers and can be contacted via: 01225 396220 or [pamela\\_chambers@bathnes.gov.uk](mailto:pamela_chambers@bathnes.gov.uk)

## 26 Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the head teacher or the chair of governors are not available and a referral is required immediately. The Bath and North East Somerset Duty Team can be contacted on 01225 615165. In addition, the school's link Social Worker is Pamela Chambers and can be contacted via: 01225 396220 or [pamela\\_chambers@bathnes.gov.uk](mailto:pamela_chambers@bathnes.gov.uk)

## 27 Confidentiality and sharing information

27.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead, headteacher or chair of governors.

### 27.2 Sharing information

27.2.1 The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for deciding to do so.

27.2.2 Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

27.2.3 Information sharing decisions will be recorded, whether or not the decision is taken to share.

27.2.4 The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer (DPO). The School's DPO is One West. They can be contacted here: 01225 395959 or [One\\_West@bathnes.gov.uk](mailto:One_West@bathnes.gov.uk)

### 27.3 Storing information

27.3.1 Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our Retention and Destruction Policy.

27.3.2 Our Confidentiality and Information Sharing policy and our Retention and Destruction policy is available to parents and pupils on request.

## 28 Special Circumstances

### 28.1 Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the

DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care. The Virtual School Head is Sarah Gunner and she can be contacted here: [virtual\\_school@bathnes.gov.uk](mailto:virtual_school@bathnes.gov.uk)

## 28.2 Children who have a social worker

28.2.1 Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the child's welfare. the school's link Social Worker is Pamela Chambers and can be contacted via: 01225 396220 or [pamela\\_chambers@bathnes.gov.uk](mailto:pamela_chambers@bathnes.gov.uk)

28.2.2 Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

## 28.3 Private fostering arrangements

28.3.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

28.3.2 Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will tell the DSL and the school will notify the local authority of the circumstances.



## 29 Appendix One - Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

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

### 29.1 Physical abuse

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

#### 29.1.1 Indicators of physical abuse

The following may be indicators of physical abuse:

- have bruises, bleeding, burns, bites, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

### 29.2 Emotional abuse

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

#### 29.2.1 Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Inappropriate emotional responses, fantasies
- Self-harm
- drug or solvent abuse
- Running away
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis



### 29.3 Sexual abuse

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

#### 29.3.1 Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate
- Depression or withdrawal
- isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- self-harm
- substance abuse
- acquire gifts such as money or a mobile phone from new 'friends'

### 29.4 Neglect

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### 29.4.1 Indicators of neglect

- The following may be indicators of neglect:
- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers



## 30 Appendix Two - Related Safeguarding policies

- Staff behaviour/Code of Conduct
- Behaviour and Anti Bullying
- Complaints procedure
- Whistleblowing
- SEN
- Grievance and disciplinary
- Supporting pupils with medical conditions