# SAFEGUARDING AND CHILD PROTECTION POLICY

| | |
|---|---|
| **ODBST Level 1 Statutory Policy:** | **ALL** Schools require this policy with **no changes** allowed to core text. No changes are necessary to personalise this with school name and branding, as this is a Trust level policy for use, without change, by all schools. LGCs will **note** adoption in LGC meetings. Review will take place at Trust level, and schools will be notified of updates and review dates as necessary. |
| **Other related ODBST policies and procedures:** | ▪ Anti-bullying<br>▪ Attendance<br>▪ Alternative Provision<br>▪ Behaviour<br>▪ Use of Force<br>▪ Suspensions and Exclusions<br>▪ Children Looked After<br>▪ Equalities<br>▪ Lettings<br>▪ SEN<br>▪ EYFS<br>▪ Health & Safety (including managing children with medical needs)<br>▪ Photography<br>▪ OnlineSafety (including use of social media)<br>▪ AI<br>▪ Staff Code of Conduct<br>▪ RSE<br>▪ Visitors<br>▪ Whistleblowing<br>▪ Safer Recruitment<br>▪ Mobile Phone<br>▪ Record Keeping |
| **Committee responsible:** | Trust Board/ Executive Committee |
| **Approved by:** | Trust Board |
| **Date Approved:** | 24th August 2026 |
| **Review date:** | 1st September 2027 |

## Contents


| Part 1 |
|---|
| Introduction |
| Terminology |
| Aims |
| The roles and responsibilities of school staff |
| What school staff need to know |
| What school staff should look out for |
| What school staff should do if they have concerns about a child |
| What schools' staff should do if a child is in danger or at risk of harm |
| What school staff should do if they have concerns about another staff member |
| What school staff should do if they have concerns about safeguarding practices within the school |

| Part 2 |
|---|
| Key personnel at our school and wider |
| Roles and responsibilities |
| Supporting Children |
| Multi agency working |
| Supporting Staff |
| Confidentiality |
| Allegations against staff and adults |
| Whistleblowing |
| Physical Intervention/Positive Handling |
| Anti-Bullying |
| Attendance |
| Health & Safety |
| Children with Special Educational Needs |
| Children potentially at greater risk of harm |
| Types of abuse and neglect |
| Specific safeguarding issues |
| Online safety |
| Opportunities to teach safeguarding |
| Allegations of abuse made against other children (peer on peer abuse) |
| Dealing with Disclosures |
| Record keeping |

| Appendices |
|---|
| Appendix A: Definitions |
| Appendix B: Allegations flowchart |
| Appendix C: Thresholds Document - Accessing Services for Children in Buckinghamshire |
| Appendix C: Threshold Document – Levels of need when working with children and families in Milton Keynes |
| Appendix D: Actions where there are concerns about a child (flowchart) |
| Appendix E: Child Protection Records held within Settings |
| Appendix F: Safer Recruitment |
| Appendix G: Briefing sheet for temporary or supply staff |
| Appendix H: Using virtual platforms– some basic considerations |

**Overview**
This document sets out the procedures for ODBST schools in relation to Safeguarding and Child Protection. The content mirrors the model Buckinghamshire Safeguarding Children Partnership (BSCP) and Milton Keynes Safeguarding Children Partnership (MKSCP) documentation and is compliant with other policies. It has been amended where necessary to reflect the independent status of ODBST as a Multi-Academy Trust. It is compliant with 'Keeping Children Safe in Education' 2026 and the required statutory content, so is applicable to all ODBST schools.

Whilst acknowledging the pressures that schools are under, it remains essential that they continue to be safe places for children. This policy supports Trustees, Local Governing Committees, Senior Leadership Teams and Designated Safeguarding Leads (DSLs) so they can continue to have appropriate regard to KCSiE 26 and keep their children safe. It suggests where schools might consider different learning offers when compared to business as usual (**Appendix H**).

ODBST takes a whole Trust approach to safeguarding.

**Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.**

**Part 1**

## 1. Introduction

This policy has been developed in accordance with the principles established by the 'Children Act' 1989 and 2004 and in line with the following:

- Working Together to Safeguard Children 2023'
- "Keeping Children Safe in Education"- statutory guidance for schools and further education colleges. Sept 2026
- Education and Training (Welfare of Children) Act 2021 which amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009;
- Safeguarding Vulnerable Groups Act 2006.
- Children Missing Education; Statutory Guidance for Local Authorities Sept 2016
- Revised Prevent Duty Guidance: England and Wales 2023
- The Equality Act 2010
- The United Nations Convention on the Rights of the Child (UNCRC)
- Multi-Agency Statutory guidance on FGM July 2020
- Generative artificial intelligence (AI) in Education DfE 2026
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers - 2024
- Online Safety Act 2023
- Disclosure and Barring Service (DBS) Guidance and Eligibility Criteria: current
- Buckinghamshire Safeguarding Children Partnership and Milton Keynes Safeguarding Children Partnership Information-Sharing Codes of Practice

The Local Governing Committee (LGC), under powers delegated by the Trustees of the Oxford Diocesan Bucks Schools Trust (ODBST), takes seriously its responsibility under Section 11 of the Children Act, section 175 of the Education Act 2002 and duties paragraph 7 of the Schedule to the Education (Independent School Standards) (England) Regulations 2014 under "working together" to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements exist within the school to identify, and support those children who are suffering harm or are likely to suffer harm.

We believe clear governance and leadership is central to embedding a safeguarding culture and recognise that all staff and Governors have a full and active part to play in protecting our children and young people from harm. We recognise that in all matters of safeguarding, the child's welfare is our paramount concern.

ODBST schools will provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child, free from discrimination or bullying where children can learn and develop happily. We recognise that as well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation outside their homes and from other children. Staff will remain vigilant and alert to these potential risks.

**This policy applies to all staff, Governors, contractors and volunteers working in our schools and with children and young people in our care.**

All Local Governing Bodies will ensure all staff at the school have read and understood their responsibilities pertaining to Part 1 of Keeping Children Safe in Education Sept 2026 in full and have entered confirmations onto SmartLog. In addition, all staff are required to read and adhere to the Staff Code of Conduct which governs behaviours expected of them, as well as having an understanding of the ODBST Behavioural Policy and Attendance Policy.

## 2. Terminology

- **Safeguarding and promoting the welfare of children** is defined for the purposes of this policy as *'providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes'*. (KCSiE para 3 )
- **Child protection** refers to the processes undertaken to meet statutory obligations laid out in the Children Act 2004 and associated guidance (see Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children – July 2023) in respect of those children who have been identified as suffering or being at risk of suffering harm.
- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
  Further information regarding the categories of abuse and safeguarding issues that can put children at risk of harm can be found in appendix A to this document.
- **Staff** refers to all those working for or on behalf of the school, full time or part time, both teaching and non-teaching. In this specific context it applies to those in both a paid and voluntary capacity and those working at the school for a third party.
- **Child** refers to all children and young people who have not yet reached their 18th birthday; Some children have additional vulnerabilities e.g. those looked after/previously looked or with a disability; these vulnerabilities do not change the definition but do place an additional responsibility on schools to have regard for their specific context and the additional/enhanced support they offer.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- **Governors** refers to members of committees of the Trust Board termed 'Local Governing Committees under the terms of the funding agreement. This includes all those appointed or elected to undertake this function or directed by Trustees to act as local Governors.
- **Trustees** are the company directors for the Oxford Diocesan Bucks Schools Trusts set up as a charitable company.

## 3. Aims

Trustees have clear aims for this policy as detailed below.

- To support children and young peoples' development in ways that will foster security, confidence and resilience, free from maltreatment and discrimination.
- To prevent impairment of children's mental and physical health or development.
- To provide an environment in which children and young people feel safe, secure, valued and respected and feel confident that they know how to approach adults if they are in difficulties.
- To ensure all teaching and non-teaching staff, are aware of the need to safeguard and promote the wellbeing of children, identifying the need for support early to promote well-being and promptly reporting cases of actual or suspected abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm and ensure that all ODBST schools contribute to assessments of need and support plans for those children.
- To acknowledge the need for effective and appropriate communication ensuring staff know how and when to share information to protect children in a way that is legal and ethical.

- To ensure ODBST schools have a clear system for communicating concerns and models for open communication between children, teachers, parents and other adults working with children.
- To underpin a structured procedure within each school, which will be followed by all members of the school community in cases of suspected abuse.
- To ensure each school has robust systems in place which accurately record safeguarding and child protection concerns, which are clearly understood by staff and adhered to. Actions taken to address concerns and outcome achieved are clearly and accurately recorded and these records are appropriately stored.
- To develop effective working relationships, guided by local documentation detailing safeguarding thresholds and LCSB guidance, with all other agencies involved in safeguarding and promoting the needs of children at our schools.
- To ensure that all staff appointed within our schools, have been through a robust 'safer recruitment' process and understand the principles of safer working practices as set out in the ODBST Staff Code of Conduct, which stipulates their duty to challenge and report where behaviours of colleagues may have stepped outside of agreed safe practices.
- To ensure that all staff receive appropriate safeguarding and child protection training which is regularly updated including training to understand roles and responsibilities with regard to the school IT system's online filtering and monitoring; receive safeguarding and child protection updates and at least annually be provided with the relevant skills and knowledge to safeguard children effectively.
- To provide clarity to other community users of our facilities with regard to our expectations of how they should maintain a safe environment which supports children's welfare and development.

## 4. The roles and responsibilities of school staff and Governors

Our staff team are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

**All our** school staff and Governors have a responsibility to provide a safe environment in which children can learn.

- Each school has a Designated Safeguarding Lead (DSL) and at least one additional DSL who together provide support to our staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- The ODBST has an appointed Executive Safeguarding Lead (ESL) who oversees all safeguarding practice in ODBST schools and works to support each DSL to carry out their duties effectively.
- All our staff are equipped to identify children who may benefit from family help/early help, understand the process and their role in it. Staff know in the first instance to discuss their concerns with the Designated Safeguarding Lead and understand they may be required to support other agencies and professionals in assessments for family help/early help.
- The Teachers' Standards 2012 state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching professions as part of their professional duties.

## 5. What school staff and Governors need to know

All our staff members and Governors are aware of the systems within our school which support safeguarding, these are explained to them as part of their induction and include:

- This child protection and safeguarding policy;
- 'Keeping Children Safe in Education' 2026, part 1;
- The ODBST staff code of conduct held on the ODBST website;

- ODBST Staff low level concerns policy;
- The role and information about the role of the DSL including the identity of the Designated Safeguarding Lead (DSL) and any deputies;
- ODBST Whistleblowing policy;
- The Trust's Behavioural Policy and the school's policies and procedures with regards to child-on-child abuse;
- The Trust's Attendance Policy – particularly for those "frequently missing education and those who go missing over time from education";
- Procedures for managing allegations about staff or volunteers;
- What to do if they have a concern about a child.

- **All** staff members and Governors must receive appropriate safeguarding and child protection training, including training to understand roles and responsibilities with regard to the ODBST IT system's online filtering and monitoring, see para 141, at induction and in addition, receive safeguarding and child protection updates, when required and at least termly, to provide them with relevant skills and knowledge to be able to safeguard the children in our setting effectively.
- **All** Staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious sexual youth violence.
- **All** Staff and Governors should know what to do when a child discloses exploitation. They should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- **All** Staff and Governors should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.
- **All** Staff are made aware of the family help/early help process and understand their role in this. This includes staff being able to identify emerging problems, liaising with the Trust's Executive Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, where appropriate, acting as the lead professional in undertaking any family help/early help assessment.
- **All** Staff are aware of the process for making child protection referrals to social care and statutory assessments that may follow, under the Children Act 1989. They also understand the role that may have to play in such assessments.
- **All** Staff and Governors know what to do if a child tells them he/she is being abused, neglected or exploited. Staff understand how to maintain an appropriate level of confidentiality, whilst at the same time understand the requirement around sharing information appropriately with the Designated Safeguarding Lead and other relevant professionals.
- **All** staff know what to do in response to children who are missing or are frequently absent from education, particularly on repeat occasions and/or for prolonged periods of time.

- **All** Staff know that the Teachers' Standards 2012 state that teachers (which includes Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- **All** staff know and understand that all low level concerns are recorded in StaffSmart, are reviewed for patterns and are retained in accordance with the ODBST low level concerns policy.
- **All** Staff are aware that there are children potentially at greater risk of harm and who need a social worker (Child in Need and Child Protection Plans); children may need a social worker due to safeguarding or welfare needs and need this help due to abuse and/or neglect and/or complex family circumstances. A child's experience 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.
- **All** staff are aware that the Head of the Virtual School has a strategic responsibility for those children who have a social worker, including those who have social care involvement due to complex SEND, and for those who have a kinship care arrangement. Schools must work with the virtual school, as well as with other relevant social care professionals, as part of effective multi-agency working to ensure the best outcomes for the most vulnerable children.
- **No** Staff and Governors will ever promise a child that they will not tell anyone about the allegation/disclosure that the child has made, as this may ultimately not be in the best interests of the child.
- The ODBST will ensure that the online filtering and monitoring system is reviewed regularly and at least annually, including the ability of the system to respond appropriately to generative AI. The annual review of filtering and monitoring arrangements will be formally recorded and reported to Governors and trustees. Trustees and Governors will receive assurance that filtering and monitoring systems remain effective and proportionate.
- All relevant staff should be aware of the additional safeguarding responsibilities placed on them in EYFS settings with regard to training, qualifications and adult ratios for all activities, as specified in EYFS risk assessments.
- **All** Staff and Governors know they should not use personal devices such as mobile phones or cameras to take photos or videos of pupils and will use school provided equipment for this purpose, including in EYFS. Other specific events which involve photographs of pupils (i.e. press, external providers etc.) will only occur with the permission of the headteacher. Staff are also aware through the 'Code of Conduct' that mobile phones should NOT be used in class or while on duty, e.g. play and lunchtimes. School policies for Early Years Foundation Stage reflect the statutory requirements[1] on the use of cameras and mobile phones.
- **All** Staff and Governors should know that the sexual abuse of children by other children is a specific safeguarding issue (also known as one form of child-on-child abuse) in education and all staff should be aware of it and of their school's procedures for dealing with it.
- **All** Staff and Governors have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.
- **All** Staff and Governors should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they

[1] Statutory framework for the early years foundation stage

have concerns about a child. It is important that staff determine how best to build trusted relationships with children and young people which facilitate communication. When a child is accessing an alternative provision, the school retains the safeguarding responsibility for that child and will maintain oversight of attendance, welfare and safeguarding arrangements throughout the placement. The school will ensure that the provision has secure and robust safeguarding arrangements in place.

- All Staff will be aware of their safeguarding obligations for children in Alternative Provision as identified in the ODBST Alternative Provision Policy**.** The ODBST check list for ensuring that any alternative provision placement is a secure and a safe one should be completed in advance of the child using the alternative provision. All documentation, including risk assessments and safeguarding documentation checks should be held in writing from the provider. A member of staff, from school, will visit the provision at least half termly and meet with the child to hear their voice and to ensure that what was agreed at the point of using the provision is still in place. ALL staff will be aware of the safeguarding risks associated with absence from school and children missing in Education. Staff will be aware of the attendance policy and any procedures for welfare checks. Where absence is linked to safeguarding, the school must engage with children's services.

## 6. What school staff should look out for

- **All** staff and Governors are aware of the signs of abuse, neglect and exploitation, so they are able to identify children who may be in need of help or protection (see annex B – Threshold Document and part 2 of this policy for the definitions).
- **All** staff and Governors have an awareness of safeguarding issues that can put children at risk of harm and of indicators and behaviours that are linked to children being in danger (see paragraph 24 of this policy for more information).
- **All** staff and Governors know that children can abuse and exploit other children (see paragraph 27 of this policy).
- **All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Advice from the DfE, provides more information on understanding and identifying abuse and neglect. https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2;
- Where safeguarding is concerned staff and Governors at our schools will maintain an attitude at all times of **"it could happen here"**. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.
- Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. If staff or Governors are unsure, they should always speak to the Designated Safeguarding Lead.
- Staff should report any concern about a child using, carrying, or expressing intent to carry a weapon to the Designated Safeguarding Lead (or a deputy) immediately.
- Understanding that any child can be at risk of harm and that any child may benefit from family help/early help that improves a family's resilience or reduces the chance of a problem getting worse.

- All school staff should be alert to the potential need for family help/early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs;
  - has special educational needs, whether or not they have an EHCP;
  - has experienced multiple suspensions, is at risk of being permanently excluded from school or attends alternative provision including a pupil referral unit;
  - has a mental health need;
  - is a young carer;
  - is showing signs of being drawn into 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 home;
  - is at risk of modern slavery, trafficking, sexual or criminal exploitation;
  - is at risk of being radicalised or exploited;
  - is gender questioning;
  - has a family member in custody or is affected by parental offending;
  - 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 or drugs themselves;
  - has returned to their family from care; is at risk of so-called honour-based abuse such as Female Genital Mutilation or Forced Marriage;
  - is a privately fostered child;
  - has unexplained/persistent absent from education, including unexplained/persistent absences for part of the school day.

## 7. What school staff should do if they have concerns about a child

- If staff or Governors have any **concerns** about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services or family help/early help services and should be made in accordance with the referral threshold set by the relevant Local Authority. (Appendix D: Thresholds Document - Accessing Services for Children in Buckinghamshire or Appendix E: Threshold Document – Levels of need when working with children and families in Milton Keynes)
- If anyone other than the Designated Safeguarding Lead makes the referral, they should inform the Designated Safeguarding Lead, as soon as possible.
- If after a referral the child's situation does not appear to be improving, the Designated Safeguarding Lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- If family help/early help is appropriate, the Designated Safeguarding Lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- If family help/early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.
- If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

## 8. What school staff should do if a child is in danger or at risk of harm

**If, a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately.** Anyone can make a referral.

Where referrals are not made by the Designated Safeguarding Lead, they should be informed, as soon as possible, that a referral has been made.

**9. What schools should do if they have concerns about another staff member**

If staff members have concerns about another staff member, then this must be referred to the Headteacher. Where there are concerns about the Headteacher this should be referred to the ODBST Executive Safeguarding Lead. Staff may consider discussing any concerns with the school's Designated Safeguarding Lead and make any referral via them. Full details can be found in this policy and is consistent with KCSiE 2026 part 4.

Allegations might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school because they:

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

The reason is because of transferrable risk. Where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic abuse at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation. In these situations, refer the case for guidance and support to ODBST Executive Safeguarding Lead.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

**10. What school staff should do if they have concerns about safeguarding practices within the school**

All our staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and that such concerns will be taken seriously by the senior leadership team.

There is a ODBST Whistleblowing Policy which is shared with all staff annually. The policy is available on each school website: Policies - Thomas Harding Junior School and at www.odbst.org.uk

Whistleblowing applies to all members of staff and all volunteers; no one is exempt and all whistleblowing is treated seriously. Where a staff member feels unable to raise an issue with the Headteacher or Chair of Governors or feels that their genuine concerns are not being addressed, they should approach the ODBST Executive Safeguarding Lead.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0808 800 5000 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk. For children under 18: Childline 0800 1111.

**11. Concerns and or allegations that do not meet the harm threshold**

Our safeguarding policies and processes deal with any concerns (including allegations) which do not meet the harm threshold but are referred to as 'low-level' concerns. We have

adopted StaffSmart as the platform for recording all low level concerns, including where LADO advice/input has been sought. StaffSmart is managed at school level and overseen at central Trust level.

Our schools work to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- encourage an open and transparent culture;
- enable schools to identify inappropriate, problematic or concerning behaviour early;
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO. Local Governing Committees adopt the Trusts low-level concerns policy within their staff code of conduct and safeguarding policy. This makes clear what a low-level concern is, the procedure for sharing such concerns which is clear, easy to understand and implement, an explanation of the purpose of the policy and how the expected behaviours are lived, monitored and reinforced constantly by all staff.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

**Part 2**

**12. Key personnel and contacts at our school and wider:**

| | Name | Contact details |
|---|---|---|
| The Designated Safeguarding Lead/Headteacher for child protection in this school | Interim: Joanne Butler<br>Substantive: Samantha Ruddell | 01494 782211 |
| Additional Designated Safeguarding Lead(s): | Sumaira Naqvi<br>Ali Arnott<br>Stef Godman | 01494 782211 |
| Designated Teacher for looked after, or previously looked after children | Interim: Joanne Butler<br>Substantive: Samantha Ruddell | 01494 782211 |
| Nominated Safeguarding Governor: | Mr V Rajadhyaksha | 01494 782211 |
| Chair of Governors : | Mr V Rajadhyaksha | 01494 782211 |
| Executive Safeguarding Lead | Jan Martin | Mobile: 07551 471094<br>Email: JMartin@odbst.org |
| Safeguarding Trustee | Michael Mill<br>Chairman of the Board | Email: MMill@trustee.odbst.org |
| **Contacts in Buckinghamshire** | | |
| **Local Authority Designated Officer (LADO):** | **01296 382070**<br>**Secure-LADO'buckinghamshire.gov.uk** | |
| **Education Safeguarding Advisory Service Duty Email** | **01296 387981**<br>**secure-esasduty@buckinghamshire.gov.uk** | |
| First Response Team (including Family help/early help, Channel) | | 01296 383962 |
| **Contacts in Milton Keynes** | | |
| **Multi Agency Safeguarding Hub (MASH)** | | **01908 253169 or 01908 253170**<br>**Email children@milton-keynes.gov.uk** |
| Local Authority Designated Officer (LADO) | | 01908 254307 |
| LADO Duty email: | | LADO@milton-keynes.gov.uk |
| Emergency Social Work Team (out of Hours) | | 01908 265545 |
| **Other Contacts** | | |
| RU Safe? (Barnardos - Child Sexual Exploitation Service) | | 01494 461112 |
| Thames Valley Police | | 101 |

| | |
|---|---|
| | (999 in case of emergency) |
| Bucks Family Information Service | 0845 688 4944 |
| MK Families Information Services (Seedlings Children's Centre) | 01908 503736 |
| NSPCC | 0800 800 5000 |
| Childline | 0800 11 11 |
| Kidscape Bullying Helpline | 0845 1205 204 |
| Female Genital Mutilation | 0800 0283550<br>fgmhelp@nspcc.org.uk |
| Samaritans | 0845 790 9090 |
| CEOP (Child Exploitation and Online Protection) | 0370 496 7622 |
| Forced Marriage Unit | 020 7008 0151<br>email fmu@fcdo.gov.uk. |
| Foreign and Commonwealth Office (Forced Marriages Section) | 0207 008 0151 |
| Crimestoppers | 0800 555 111 |

**13. Roles and responsibilities**

In ODBST primary schools, the DSL will be the Headteacher and will coordinate child protection arrangements and this person is named in this policy guidance. Each school ensures that the Designated Safeguarding Lead or a deputy will be on site, or very easily contactable, at all times that the school is functioning.

In secondary schools, the DSL responsibility may be delegated to a senior member of staff but the Headteacher retains their overarching role in respect of safeguarding and child protection.

In 52 week nursery provision, the nursery DSL responsibility may, at times, be delegated to the nursery lead but the Headteacher retains their overarching role in respect of safeguarding and child protection.

All Trustees and Governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Local Governing Committees and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

**Trustees of the Oxford Diocesan Bucks Schools Trust (ODBST)**

Trustees will:

- ensure that all members of the Trust Board understand and fulfil their responsibilities and complete safeguarding training on appointment and regularly thereafter, to also include Prevent training;

- provide the strategic leadership for the Trust with responsibility for the Trust's safeguarding arrangements and must ensure that they comply with their duties under legislation;
- have regard to guidance, ensuring policies, procedures and training in their schools are effective and comply with the law at all times;
- as a Charitable Trust, ensure the Charity Commission guidance on charity and trustee duties to safeguard children applies;
- have a senior board member lead to take leadership responsibility for the Trust's safeguarding arrangements;
- ensure policies and procedures adopted by the board (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff;
- ensure that schools and LGCs have the right level of support and resources to fulfil their duties;
- set out risks and how they will be managed in a risk register which is regularly reviewed;
- respond quickly to concerns and carry out appropriate investigations and never ignore harm or downplay failures;
- ensure enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people are available;
- conduct periodic reviews of safeguarding policies, procedures and practice;
- review, at least annually, the filtering and monitoring systems in place across the ODBST supported by a report from the Executive Safeguarding Lead;
- **make sure protecting children and young people from harm is central to its culture and work.**

**The ODBST Central HR Team**

The ODBST central team will ensure that all schools operates a safer recruitment procedure, as detailed in the ODBST safer recruitment policy, that includes:

- all applications are made via MyNewTerm;
- all statutory checks on staff suitability to work with children and the prohibition regulations are undertaken before a post is confirmed;
- DBS renewal every 3 years;
- online searches form part of the shortlisting process and findings are risk assessed and recorded. Applicants are notified of these online searches;
- seeking at least two references with checks being made to verify the identity of the person completing these;
- ensuring safeguarding messages are contained in recruitment materials and adverts;
- all recruitment interviews contain questions or scenarios of a safeguarding nature;
- ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training and that this person is clearly identified on all recruitment materials;
- ensuring that at least one member of the LGC has completed safer recruitment training to be repeated every five years;
- all staff are recorded on the online SCR which is checked regularly, and at least once a term.

**The Local Governing Committee (LGC)**

LGCs under their delegated powers understand and fulfil their statutory safeguarding responsibilities and undertakes to regularly review safeguarding related policies and procedures that operate in each school.

The LGC have a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements.

The LGC will ensure that:

- all members of the governing body understand and fulfil their responsibilities and complete safeguarding training on appointment and regularly thereafter, to also include Prevent training;
- the Headteacher creates and maintains a strong, positive culture of safeguarding within the school;
- this policy reflects the unique features of the community it serves and the needs of the pupils attending their provision; review this at least annually and regularly monitor and evaluate the effectiveness of this Child Protection Policy;
- in ODBST primary schools, the DSL will be the Headteacher and will coordinate child protection arrangements and this person is named in this policy guidance. Each school ensures that the Designated Safeguarding Lead or a deputy will be on site, or very easily contactable, at all times that the school is functioning.
- in secondary schools, the DSL responsibility may be delegated to a senior member of staff but the Headteacher retains their overarching role in respect of safeguarding and child protection.
- in 52 week nursery provision, the nursery DSL responsibility may, at times, be delegated to the nursery lead but the Headteacher retains their overarching role in respect of safeguarding and child protection.
- DSLs will have undertaken the approved LSCP training in inter-agency working, in addition to basic child protection training. Their roles and responsibilities are made explicit in those post-holders' bespoke DSL job descriptions. The role carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively;
- a named teacher is designated for Children Looked After; that an up to date list of children who are subject to a Care Order or are accommodated by the Local Authority is regularly reviewed and updated, the school's work with the Virtual Schools Team to support the educational attainment for those children who are Looked After, monitored and staff have the skills, knowledge and understanding to keep looked after children safe;
- ensures the school follows the ODBST staff behaviour (code of conduct), whistle blowing and other procedures that are consistent with statutory requirements. These, with the Child Protection/Safeguarding policy, are and made available to parents on the school's website and, on request in printed format;
- ODBST Procedures exist for dealing with allegations of abuse and exploitation made against members of staff including allegations made against the Headteacher;
- ensure the needs of pupils for early intervention and Child Protection, are fully understood and resources allocated to meet identified needs;
- it has due regard to the relevant data protection principles set out in the Data Protection Act 2018 and the GDPR, which allow the Trust to share or withhold personal information when it is necessary to safeguard any child;
- where reasonably possible, schools should hold more than one emergency contact number for each pupil. This goes beyond the legal minimum but is good practice in giving additional options to make contact with a responsible adult when a child is missing from education or is absent from education is also identified as a welfare and/or safeguarding concern;
- arrangements are in place to keep children safe where governing committees or proprietors hire or rent out school or college facilities/premises to organisations or individuals;
- a training strategy is agreed by Governors that ensures all staff, including the Headteacher, receive child protection training, at three-yearly intervals and knowledge and skills updated regularly via bulletins, local briefing and ODBST termly briefings;

- the Designated Safeguarding Lead should receive refresher training at two-yearly intervals and knowledge and skills updated regularly via bulletins, local briefing and ODBST termly briefings;
- all safeguarding training must be regularly updated in line with KCSiE and local safeguarding partnership requirements;
- arrangements are in place to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection;
- they nominate a member (normally the chair) to be responsible for liaising with the local authority, the ODBST and other agencies in the event of an allegation being made against the Headteacher;
- measures are in place for the LGC to have oversight of how the school's delivery against its safeguarding responsibilities are exercised, evidenced and reported to the LGC and the Trust at least termly through regular monitoring and first had contact with pupils and staff to check on the discharge of their responsibilities including the maintenance of child protection files;
- ensure robust structures are in place to challenge the Headteacher where there are any identified gaps in practice or procedures are not followed. An annual report is submitted to the local authority and termly to Trustees of ODBST about how the LGC's duties have been carried out. Any weaknesses or areas of concern will be rectified without delay;
- ensure measures are in place to have oversight of how the school's delivery on its responsibilities are exercised and evidenced, following up with the Headteacher any identified gaps in practice or where procedures may not have been followed;
- there is clarity in meeting minutes around child-on-child abuse and a zero tolerance approach to abuse with a need for an "*it could happen here*" approach;
- the school operates a safer recruitment procedure, as detailed in the ODBST safer recruitment policy, that includes:
    - all applications are made via MyNewTerm;
    - all statutory checks on staff suitability to work with children and the prohibition regulations are undertaken before a post is confirmed;
    - DBS renewal every 3 years;
    - online searches form part of the shortlisting process and findings are risk assessed and recorded. Applicants are notified of these online searches;
    - seeking at least two references with checks being made to verify the identity of the person completing these;
    - ensuring safeguarding messages are contained in recruitment materials and adverts;
    - all recruitment interviews contain questions or scenarios of a safeguarding nature;
    - ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training and that this person is clearly identified on all recruitment materials;
    - ensuring that at least one member of the LGC has completed safer recruitment training to be repeated every five years;
    - all staff are recorded on the online SCR which is checked regularly, and at least once a term.
- children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum through personal, social, health and economic education (PSHE) including following the new statutory relationship and sex education (RSE) guidance;
- schools have a carefully planned and mapped safeguarding curriculum that ensures children learn about and understand the key safeguarding messages and this includes planned visits from national and local safeguarding bodies (i.e. NSPCC). ChildLine and other appropriate posters are exhibited throughout the school and the children are aware of its service;
- the curriculum will address misogyny, harmful gender stereotypes, sexual harassment, sexual violence and Violence Against Women and Girls (VAWG) as part of our preventative safeguarding approach;

- appropriate safeguarding responses are in place for children who have unexplained and or persistent absences from education, to help identify the risk of abuse, neglect and exploitation including sexual abuse or exploitation and to help prevent the risks of their going missing or experiencing prolonged periods of absence in future;
- appropriate online filtering and monitoring systems are in place ensuring an annual review of their approach to online safety, supported by an annual risk assessment and all staff, Governors and Trustees understand the use of these filtering systems and their responsibilities around their usage;
- enhanced DBS checks are in place for all members of the LGC; a section 128 check is also required for all those in "management positions" in an academy. Where that person is engaged in regulated activity, a DBS check with barred list information is obtained and this will identify any section 128 direction. A separate check is made to see if that person is subject to a section 128 direction (for process see https://www.safeguardinginschools.co.uk/complete-prohibition-checks-including-s128-check/ ) Enhanced DBS checks are however not mandatory for any Associate Members appointed by the board to a local governing body;
  (*Note: Where a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the Designated Safeguarding Lead will make a referral to the Disclosure and Barring Service, as required by the Safeguarding Vulnerable Groups Act 2006, and the Head Teacher will ensure that he or she has done so).
- any weaknesses in Child Protection are remedied immediately.

**The Nominated Governor will:**

- undertake the training available for Nominated Governors ;
- ensure child protection is, as a minimum, a half termly agenda item for the LGC;
- meet termly with the DSL to review and monitor the school's delivery on its safeguarding responsibilities;
- evidence this through regular monitoring reports involving first hand contact with pupils and staff to check on the discharge of their responsibilities including the maintenance of child protection files in CPOMS.

**The Headteacher/DSL will:**

- create a culture of safeguarding where children are protected from harm. Helping staff to be professionally curious, question behaviours and to "think the unthinkable" if they have concerns for a pupil;
- develop a culture of listening to children and taking account of their wishes and feelings, among staff, in any measures the school may put in place to protect them; and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication;
- is appropriately trained and records are kept to show this is updated every 2 years;
- understands the filtering and monitoring systems and processes in place at the school and undertakes at least termly review of these;
- ensure that the safeguarding and child protection policy and procedures are implemented and followed by all staff;
- oversee a "whole school approach" ensuring policies, procedures and training in their schools are effective and comply with the law at all times;
- follows the ODBST policy and process for recording and storing information about child protection concerns and outcomes achieved, enabling records to be reviewed and an overview gained, to support timely interventions and allowing prompt follow up, if it is felt the needs of the pupil are not being met;
- refer cases of suspected neglect and/or abuse to the Local Children's Safeguarding Partners, children's social care or police in accordance with this guidance and local procedure and in in line with Working Together to Safeguard Children 2023. They understand when they should consider calling the police and what to expect when they do;

- notify children's social care if a child with a child protection plan remains absent without a valid parental contact having been established, on the second day of absence at the latest;
- ensure that when a child with a child protection plan leaves the school, their information is passed to their new school within 5 days and the child's social worker is informed immediately;
- attend and/or contribute to child protection conferences in accordance with local procedure and guidance;
- coordinate the school's contribution to child protection plans;
- develop effective links with relevant statutory and voluntary agencies;
- ensure that all staff sign to indicate that they have read and understood this policy;
- liaises with the nominated governor as appropriate;
- keep a record of staff attendance at child protection training;
- provide an termly report for the LGC, detailing how the school delivers on its safeguarding responsibilities and any child protection issues within the school;
- submit a termly report to the LGC and follows this up termly so that all actions are managed appropriately;
- attend termly DSL strategic sessions as run by the Executive Safeguarding Lead;
- make this policy available to parents;
- assure the quality of the information that is presented to the Trust and Governors both in terms of the designated safeguarding governor and then the wider governing board enable them to discharge the roles and responsibilities;
- allocate sufficient time and resources to enable the designated safeguarding lead and deputy DSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with ODBST's whistleblowing procedures www.odbst.org.uk and Policies - Thomas Harding Junior School;
- ensure that children's safety and welfare is addressed through the curriculum;
- ensure that where a concern is raised about a child using, carrying, or expressing intent to carry a weapon, the DSL (or deputy) will assess the risk and take appropriate action, including de-escalating peer conflict where appropriate;
- ensure that all children in EYFS are assigned a key person;
- ensure that all specific EYFS safeguarding requirements are met including those specific to nappy changing and intimate care and those around eating;
- ensure that all EYFS staff use technology safely and in line with the ODBST policy and expectations around the use of mobile phones and cameras in the setting.

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.

**Deputy Designated Safeguarding Lead**
*The ODBST determines that all schools have at least one deputy DSL.*

The role-holder will be appropriately trained and, in the absence of the Designated Safeguarding Lead, carries out those functions necessary to ensure the ongoing safety and protection of children. They will be allocated time to carry out their duties and will have a clear job description alongside appropriate training. In the event of the long-term absence of the designated person, the deputy will assume all the functions above.

**All staff will:**

- follow the Local Authority guidance in all cases of abuse, or suspected abuse. These can be found for Buckinghamshire at Report a Concern – Professional or Milton Keynes, Levels of need when working with children and their families or use contacts from the Key Contacts list in section 11;
- always act in the interests on the child;
- know the identity of the DSL and how to contact them;
- know what to do when a child tells them they are being abused or neglected. This includes understanding that they should never promise a child that they will not tell anyone else about a report of abuse as this is unlikely to be in the best interests of the child;
- should reassure all victims 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 abuse, sexual violence or sexual harassment, nor should a victim even be made to feel ashamed for making a report;
- should be aware that technology is a significant component in many safeguarding and well-being issues. That children at risk of abuse and other risks online as well as face to face. That, in many cases, abuse and other risks will take place concurrently both online and offline. That children can also abuse other children online and that this can take the form of abusive, harassing and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content;
- where you have any concerns about a child's welfare, you should act on them immediately; report your concerns to the DSL or the headteacher without delay;
- attend annual training opportunities arranged or delivered by the DSL, in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed to promote a child's welfare. Staff will be supported to further develop their understanding as mechanisms are enhanced via team meetings, newsletters and e mail updates.

Schools will therefore:

- implement and follow this policy;
- understand that responsibility to safeguard children requires that all appropriately share any concerns about children;
- support the child's development in ways that will foster security, confidence and resilience;
- provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties;
- provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children where appropriate;
- ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral. Guidance on record keeping can be found at appendix F and
  - https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines.pdf
  - https://www.milton-keynes.gov.uk/assets/attach/60432/Child-Protection-Record-Keeping-Guidance-for-Schools-May-2019.pdf

**Visitors** will be:

- clearly identified with visitor/contractor passes;
- met and be directed by school staff/representatives;
- signed in and out of the school using Inventory;
- given a safeguarding leaflet to read or directed to a poster informing them of how to report a concern (change according to your own school procedures);
- given restricted access to only specific areas of the school, as appropriate;

- escorted by a member of staff/representative as required;
- given access to pupils restricted to the purpose of their visit.

**14. Multi agency working**

Schools have a pivotal role to play in multi-agency safeguarding arrangements. Trustees and LGCs should ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2026.

The Local Safeguarding Children Partnership will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. LGCs, Trustees and school senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

If named as a relevant agency, ODBST schools, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

**15. Supporting Children**

We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth. We also accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our schools will support all children and young people by:

- encouraging the development of self-esteem and resilience in every aspect of life;
- promoting a caring, safe and positive environment;
- liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- notifying Social Care as soon as there is a significant concern;
- notifying Social Care when a child/young person attending the centre is privately fostered;
- providing continuing support to a pupil (about whom there have been concerns) who leaves the school by ensuring that such concerns and school medical records are forwarded under confidential cover to the Designated Safeguarding Lead at the pupil's new school immediately.

**16. Confidentiality**

We recognise that all matters relating to child protection are confidential and the Designated Safeguarding Lead will disclose personal information about a child or young person to other members of staff on a need-to-know basis only.

However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and all staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.

Schools will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the LSCP or Social Care on this point. We will take no names consultations with our local Authority Designated Officer/ Assessment Teams / Multi Agency Safeguarding and Family help/early help Hub (MASH) to discuss concerns we may have, but we understand that if they then ask for a name, we will disclose those details and it will become a referral.

Trustees and Local Governing bodies should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- Using the DfE Data protection in schools' guidance 2023 to ensure schools comply with data protection law and with reference to the ODBST GDPR policy;
- being confident of the processing conditions which allow them to store and share information for safeguarding purposes;
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data;
- not providing pupils' personal data where the serious harm test under the legislation explained on the Disclosure and Barring service website, is met and guidance sought from the Data protection: toolkit for schools .

## 17. Supporting Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Staff will be supported by the opportunity to talk through their anxieties with the Designated Person and to seek further support. This could be provided by another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate.

The ODBST guidance on conduct for staff at school forms part of staff induction. We understand that staff should have access to advice on the boundaries of appropriate behaviour.

Designated Person(s) should have access to support and appropriate workshops, courses or meetings as organised by the LA. Half termly ODBST safeguarding supervision is in place for DSLs to access across the Trust.

## 18. Allegations against staff and adults

All staff and adults (including supply staff, contractors and volunteers) should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults (see Lone Working Policy).

We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior member of staff available.

The manager on all such occasions will discuss the content of the allegation with the Designated Officer for the Local Authority (LADO) and the ODBST Executive Safeguarding Lead , **before taking any action.**

**In Buckinghamshire, the Local Area Designated Officer (LADO) can be contacted on 01296 382070.**
**Education Safeguarding Advisory Service Duty Line**

- **01296 387981**
- **secure-esasduty@buckinghamshire.gov.uk**

**Children's Services Out-of-Hours contact: 0800 9997677**

**In Milton Keynes, the Local Authority Designated Officer (LADO) can be contacted on 01908 264307. The LADO Officers are:**

- **Jo Clifford 01908 264307**
- **Sarah Capel-Jones 01908 264307**

**The Milton Keynes MASH (Multi Agency Safeguarding Hub) Duty Line:**

- **01908 263169/70**
- **children@Milton-keynes.gov.uk**

**Milton Keynes Emergency Social Work Team 01908 265545**

If the allegation made to a member of staff **concerns the Headteacher**, the person receiving the allegation will immediately inform the ODBST Executive Safeguarding Lead, who will consult with the relevant LADO and HR, without notifying the manager first.

The school will follow the procedures for managing allegations against staff, as outlined in 'Keeping Children Safe in Education' 2026.

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult with the LADO and ODBST Executive Safeguarding Lead in such circumstances.

Where a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the Designated Safeguarding Lead will make a referral to the Disclosure Barring Service, as required by the Safeguarding Vulnerable Groups Act 2006, and the Headteacher will ensure that he or she has done so. **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

Supply teachers - In some circumstances schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency.

Whilst schools are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead.

When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

School lettings agreement for other users requires that the organiser will follow ODBST procedures for managing allegations against staff and, where necessary, the suspension of adults from premises.

See flowchart appendix E.

## 19. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues and appropriate advice will be sought from the LADO or Safeguarding Team where necessary.

- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. (**0808 800 5000** – line is available from 8:00 AM to 8:00 PM, Monday to Friday; Email: help@nspcc.org.uk)
- A tool to support safeguarding concerns to be reported can be found on our website which has the Department for Education "Report a concern" button.
- Full details are provided in our whistleblowing policy.

## 20. Physical Intervention/Positive Handling

Our policy on physical intervention/positive handling by staff is set out separately, as part of the ODBST Use of Restrictive Intervention Policy.

- Such events should be recorded on CPOMS using the ODBST template and include the names of any witness.
- Parents should be informed when there has been a use of force and the template shared with them and stored with their signature.
- Staff who are likely to need to use physical intervention should be appropriately trained using accredited training.
- We understand that physical intervention of a nature which is both unreasonable and disproportionate to the circumstances and or causes injury or distress to a child may be considered under child protection or disciplinary procedures.

## 21. Anti-Bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- Individual School policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Bullying is a safeguarding matter that if left unresolved can become a child protection matter. The ODBST will take seriously any bullying concerns, and both investigate and act to protect pupils where appropriate.
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs, is made aware to all staff.
- Cyber-bullying is a form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click. School's policies should integrate cyberbullying prevention into relevant policies and practices; ensuring reporting routes are accessible and visible; promoting the positive use of technology; and evaluating the impact of prevention activities.
- Schools will liaise with the anti-bullying co-ordinator/officer where appropriate https://www.buckssafeguarding.org.uk/childrenpartnership/parent-and-carers/bullying/
- Full details are in our anti-bullying policy.

## 22. Attendance

- Attendance is a key part of safeguarding and that attendance is everyone's responsibility. There is clear alignment between the ODBST Attendance policy and this ODBST Safeguarding and Child Protection policy.
- The ODBST Attendance Policy has robust systems in place for monitoring attendance and we will act to address absenteeism with parents and pupils promptly to effect change and identify any safeguarding issues arising.
- All ODBST schools will complete the DfE statutory requirement to submit the daily attendance register with accurate coding as per the ODBST attendance policy.
- All pupils attending ODBST schools are required to have a minimum of two identified emergency contacts; this is to support prompt communication in the event of a serious incident or a child missing from school or where a child has been absent over time.
- We have a robust 'first day alert' call system to establish reasons for non-attendance.
- Links are made with alternative provision providers to ensure that any absence is reported to the school so that no pupil is absent without a first day alert in place.
- Any pupil absent for ten school days, where it has not been possible to make contact with a parent/carer, will be reported as a Child Missing in Education using the CME Protocol. (see Children Missing from Education Policy).
- Any absence of two consecutive school days, without satisfactory explanation, of a pupil currently subject to a child protection plan will be referred to their social worker on the second day of absence at the latest.
- Parents must inform school if there are any changes to where a pupil will be living. The school has a mandatory duty to inform the local authority Via the First Response

Team, if a child under the age of 16 yrs., lives with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

**23. Health & Safety**

- Health & Safety policies, reflect the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits.
- Full details are in the health and safety policy.

**24. Children with Special Educational Needs/Disabilities**

We recognise that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEND can be disproportionally impacted by things like bullying without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers;
- cognitive understanding -being able to understand the difference between fact and fiction in online content and then repeating the content and/or the behaviours in schools and not understanding the consequences of doing so.

To address these additional challenges leaders and managers will consider the need for extra pastoral support for children with SEND to identify and mitigate these risks alongside ensuring that any appropriate support for communication is in place. There is a duty to make reasonable adjustment for children with SEND.

Following the theme of children looked after or who may have SEN and/ disabilities, the use of reasonable force is emphasised in KCSiE 2026 as something that schools need to be cautious about. There are some circumstances when reasonable force might be a possibility, or it might be part of a strategy to deal with an incident of very challenging behaviour, but this guidance, should focus on creating individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.

The Special Educational Needs and Disabilities information and Support Services (SENDIASS) offer information, advice and support for the parents and carers of children and young people with SEND. All local authorities have such a service.

**25. Children potentially at greater risk of harm**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation 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.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing 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).

The ODBST recognises that being lesbian, gay or bisexual or gender questioning is not in itself a safeguarding concern and is not an inherent risk factor for harm. However, some

children may experience discrimination, prejudice, bullying, harassment, social isolation or abuse because of their actual or perceived sexual orientation. Such experiences can have a significant impact on a child's welfare, attendance, emotional wellbeing and educational outcomes.
The ODBST is committed to providing a safe, inclusive and respectful environment where all children feel valued, listened to and protected from harm. Staff will challenge derogatory language, prejudice-based bullying and discriminatory behaviour and will respond promptly to any concerns in accordance with this policy and the ODBST behaviour and anti-bullying polices.
The ODBST recognises that children who are gender questioning may, in some circumstances, experience additional vulnerability, particularly where they face bullying, exclusion, family conflict, poor mental health or online exploitation.

Staff should maintain a child-centred approach, avoiding assumptions, and should consider each case individually. Where a child is identified as gender questioning, the Designated Safeguarding Lead will consider any safeguarding, welfare and mental health needs alongside the child's wishes, feelings, age and understanding. Parents will normally be involved in discussions regarding support for their child unless doing so presents a risk of significant harm to the child. In response to a request relating to gender questioning or social transition, the school will record the request, the individuals consulted, the decision reached, and the reasons for it. A School should not initiate social transition.

The school will work with parents, carers, health professionals, social care and other relevant agencies, where appropriate, to ensure that any identified needs are supported and that children receive timely and effective help. All decisions will be made in the best interests of the child and in accordance with safeguarding duties, equality legislation and current statutory guidance.

Separate toilet facilities will be provided for boys and girls from the age of 8 and pupils should not use toilets or changing facilities designated for the opposite biological sex. However, schools may consider alternative individual facilities where appropriate and provided these do not compromise the privacy, dignity, comfort or safety of other pupils.

Where a decision is made regarding a pupil's access to facilities, or in response to a request relating to gender questioning or social transition, the school will record the request, the individuals consulted, the decision reached, and the reasons for it.
This record will be retained in line with the school's record-keeping procedures and reviewed if circumstances change.

Pupils aged 11 and over must not change clothes, undress or shower in the presence of pupils of the opposite biological sex.
Overnight accommodation on school trips, visits and residential stays will be provided on a single-sex basis, and pupils will not share sleeping accommodation with pupils of the opposite biological sex.

Single-sex sports arrangements may be maintained where necessary for safety or fairness. Participation requests should be considered in line with these principles.

Staff should be aware that any child may be vulnerable to abuse, exploitation or harm regardless of their protected characteristics, and all safeguarding concerns will be assessed on an individual basis with the welfare of the child remaining paramount at all times.

**26. Types of abuse and neglect**

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

- **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's mental health and emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. These and other forms of emotional abuse may also signal that children are at risk from, or are involved with, serious violent crime including receiving unexplained gifts/new possessions, increased absence from school and changes in friendship/relationships with others/groups; significant decline in performance, self-harm, signs of assault/unexplained injury.

- **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet); up-skirting, typically when a photograph is taken under a child or young person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress, or alarm (and which is now a criminal offence). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate

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

- **Child-on-child abuse:** a form of abuse in which a child is abused (sexually) by one or more other children or adolescents, and in which no adult is directly involved. This includes when one of the children uses physical force, threats, trickery or emotional manipulation to elicit cooperation, it also can include non-coercive situations where the victim does not understand the nature of and simply goes along with, not comprehending its implications or what the consequences might be. Child-on-child sexual abuse is differentiated from normative sexual play or anatomical curiosity and exploration (e.g. "playing doctor") because child-on-child sexual abuse is an overt and deliberate action. When sexual abuse is perpetrated by one sibling upon another, it is known as "inter-sibling abuse".
    - All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.
    - All staff should recognise misogynistic and misandrist behaviours as potential indicators of harmful attitudes that may underpin sexual harassment, abusive behaviour and violence.
    - All staff should be clear as to the school's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- consensual and non-consensual sharing of nudes and semi nudes images and/or videos;
- 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 and initiation/hazing type violence and rituals.

**27. Specific safeguarding issues**

**All** staff have an awareness of safeguarding issues- some of which are listed below and in KCSiE 26. Staff are made aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

They understand safeguarding and protection of students has to be viewed within the context of the pupil's lived experience and the factors around him/her which may impact on this: friends, family school and their community.

The changing landscape of safeguarding and protecting children from harm requires staff to be aware of children being trafficked both from abroad and locally as part of ongoing exploitation; financial or sexual. Our admissions processes will therefore ask for proof of identification and who has parental responsibility for a student – where managed at point of entry by the Local Authority this process will have been initiated by them. We will however ask parents/carers to update contact details and alert us to changes of address or care arrangements within 48 hrs of a change.

**All** staff are made aware that safeguarding issues can manifest themselves via child on child abuse, themes of exploitation and management of sexual violence and sexual harassment. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-

based violence/sexual assaults and sexting. Staff are made clear of our policy and procedures with regards to peer on peer abuse:

- bullying including cyberbullying:
  http://www.bucks-lscb.org.uk/professionals/e-learning
  https://www.milton-keynes.gov.uk/schools-and-lifelong-learning/send-local-offer/localoffer-search/service/374
- Child Criminal Exploitation (CCE)
  https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/
- children missing education:
  http://www.bucks-lscb.org.uk/wp-content/uploads/BSCB-Procedures/Children_Who_Go_Missing_from_Education_Procedure.pdf
- child missing from home or care:
  https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care__3_.pdf
- child sexual exploitation (CSE):
  http://www.bucks-lscb.org.uk/professionals/exploitation/child-sexual-exploitation-2/
- domestic abuse:
  http://www.bucks-lscb.org.uk/parents-carers/domestic-abuse/ or
  http://www.bucks-lscb.org.uk/wp-content/uploads/BSCB-Procedures/Domestic_Abuse.pdf
  https://www.gov.uk/guidance/domestic-abuse-how-to-get-help
- Drugs:
  https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf
- fabricated or induced illness:
  https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf
- faith abuse
  https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action_Plan_-_Abuse_linked_to_Faith_or_Belief.pdf
- female genital mutilation (FGM):
  http://www.bucks-lscb.org.uk/parents-carers/female-genital-mutilation-fgm/ forced marriage and honour-based violence:
  https://www.gov.uk/guidance/forced-marriage
  https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage
- Gang Violence, Exploitation and Drug Supply:
  https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence

  https://www.nationalcrimeagency.gov.uk/who-we-are/publications/15-county-lines-gang-violence-exploitation-and-drug-supply-2016

  https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- gender-based violence/violence against women and girls (VAWG):
  https://www.gov.uk/government/policies/violence-against-women-and-girls
- hate:
  http://educateagainsthate.com/

- mental health:
  https://www.gov.uk/government/publications/mental-health-and- behaviour-in-schools--2
  https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak
- modern slavery:
  https://www.gov.uk/government/collections/modern-slavery
  https://www.antislavery.org/take-action/schools/
- human trafficking:
  https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance
  http://www.nationalcrimeagency.gov.uk/crime-threats/human-trafficking
- missing children and adult's strategy:
  https://www.gov.uk/government/publications/missing-children-and-adults-strategy
- online safety:
  http://www.bucks-lscb.org.uk/professionals/e-learning/
- private fostering:
  http://www.bucks-lscb.org.uk/professionals/private-fostering/
- preventing radicalisation:
  http://www.bucks-lscb.org.uk/professionals/exploitation/prevent-radicalisation/
- relationship abuse:
  https://www.disrespectnobody.co.uk/relationship-abuse/what-is- relationship-abuse/
- Sexual violence and sexual harassment between children:
  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf
- sexting:
  https://www.disrespectnobody.co.uk/sexting/what-is-sexting/

**KCSiE 2026 contains important additional information about specific forms of abuse and safeguarding issues. All staff are required to read this.**

**28. Online safety**

Pupils increasingly work online and it is essential that pupils are appropriately safeguarded from potentially harmful and inappropriate online material, including that generated through AI. Schools should be mindful to the potential dangers of disinformation, misinformation and conspiracy theories and ensure that the curriculum teaches pupils how to recognise potentially harmful information including how to manage opinion and points of view found online. Staff should be aware that technology-facilitated abuse includes AI-generated sexual imagery, deepfakes, nudification applications and manipulated images used to harass, exploit or abuse children. The ODBST will ensure that appropriate filtering and monitoring on school devices and school networks including that for generative AI is effective and is able to recognise potentially harmful material as far as is possible. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The ODBST ensures that appropriate filters and appropriate monitoring systems are in place. These systems are regularly monitored, at least annually, by the DSL, IT provider and nominated governor. A record will be kept of the reviews.

We share with parents/carers our policy on the school's website and provide parent information to support this aspect in the pupil's home.

All staff will have an understanding of expectations roles and responsibilities with regards to the online filtering and monitoring processes.
To support schools to meet this duty, the Department for Education has published filtering and monitoring standards which set out what schools should do. Additional guidance on filtering and monitoring can be found at UK Safer Internet Centre
www.saferinternet.org.uk/advice
Our filtering will include the blocking of harmful and inappropriate content without unreasonably impacting teaching and learning.

All our pupils and users of the school's network will sign an 'acceptable use' statement and the staff code of conduct has specific guidance about social networking and contact, online, with pupils.

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

- **content**: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views including that generated through AI;
- **contact**: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- **commerce**: the risks relating to online transactions, such as scams, advertising targeted at children or the commercialisation of personal data

Schools should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the Designated Safeguarding Lead and any parental engagement.

All staff are aware of the Online safety policy which sets out our expectations, including our expectations in EYFS, relating to:

- Creating a safer online learning environment (see Appendix I);
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe online, question the information they are accessing and support the development of critical thinking;
- Inspiring safe and responsible use and behaviour of mobile technologies, to combat behaviours on-line which may make students vulnerable including sexting;
- Use of mobile technology both within school and on school trips/ outings;
- Use of camera equipment, including camera phones, including in EYFS;
- What steps to take if there are concerns and where to go for help;
- Staff use of social media as set out in the Staff Code of Conduct.

Cyber-bullying by children, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This includes sexting and image exchange under threat or use of coercion. Pupils, staff and parents are supported to understand the risks posed by the CONTENT accessed by pupils – their CONDUCT online– and who they have CONTACT within the digital world.

Parents and staff understand the threat to pupil safety through misinformation, disinformation and conspiracy theories, including that generated through AI, and are supported to ensure that pupils are kept as well informed and safe from these dangers.

Trustees do not expect that mobile phones will be available for children and young people onsite unless there is as specific medical or social care reason; the use in these circumstances will be reviewed regularly and be subject to an individual risk assessment. The ODBST mobile phone policy sets out the acceptable use of mobile technologies by pupils whilst onsite. This includes sanctions which will be applied when these boundaries are not adhered to. Trustees will continue to regularly review their approach to mobile technologies by pupils and staff as part of their wider safeguarding and online safety arrangements.

Visitors to schools are respectfully requested to turn all mobile devices off. This is a safeguarding measure for our pupils.

Staff use of mobile technology whilst on site is set out in the Staff Code of Conduct.

**Sharing nude or semi-nude images and videos**

This is also known as sexting or youth produced sexual imagery and which includes "up-skirting" and is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

Staff, pupils and parents are supported via the PHSE curriculum to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes imagery of pupils themselves if they are under the age of 18.

Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in the publication 'Sharing nudes and semi-nudes: how to respond to an incident' produced by the UK Council for Child Internet Safety. This requires us to share reports of sexting with the police.

**Opportunities to teach safeguarding**

Schools will ensure pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. Teaching of on-line safety in schools https://www.gov.uk/government/publications/teaching-online-safety-in-schools or https://www.pshe-association.org.uk/curriculum-and-resources/resources/life-online-planning-resource-ensure-your-pshe This may include covering relevant issues through personal, social, health and economic education (PSHE) and through the statutory requirements to teach relationships education and relationships and sex and health education (RSE) including the latest updated guidance that all ODBST schools should take into account from September 26 and implement fully by September 26: and health education for all pupils. Resources that could support schools include:

- Be Internet Legends developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils.
- Disrespectnobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography.
- Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- PSHE association provides guidance to schools on developing their PSHE curriculum.

- Teaching online safety in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirement.
- Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources.
- UK Safer Internet Centre developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- LGFL 'Undressed' provides schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

**29. Allegations of abuse made against other children including sexual violence and sexual harassment**

ODBST believes that all children have a right to attend school and learn in a safe environment free from harm by both adults and other pupils. We recognise that some safeguarding concerns can occur via child-on-child abuse.

Abuse between children is still abuse. All staff operate a zero-tolerance policy to child-on-child abuse and will not pass off incidents as 'banter' or 'just growing up.

All staff recognise that child on child issues may include, but may not be limited to:

- Bullying (including cyber bullying)
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm
- Sexual violence and sexual harassment
- 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
- Abuse related to sexual orientation or identity
- Sending nude or semi-nude images (consensual & non-consensual)
- Upskirting and initiation/hazing type violence and rituals
- Emotional abuse
- Abuse within intimate partner relationships

Our staff recognise that children are capable of abusing their peers. In a situation where child abuse is alleged to have been carried out by another child, our child protection procedures should be adhered to for both the victim and the alleged abuser; this means it should be considered as a childcare and protection issue for both children.

Some of these behaviours will need to be handled with reference to other policies in school such as the behaviour policy, anti-bullying policy, child protection policy and online safety policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns and ODBST recognises that these include:

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality;
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18;
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others;

- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. Moreover, allegations of children at risk from or involved with serious violent crime are of such a serious nature as to raise safeguarding concerns.

Our schools also understand the different gender issues that can be prevalent when dealing with harmful sexual behaviour. CYP can also experience harmful sexual behaviour in various settings. This includes at school, at home (or at another home), in public places, and online. At our school, issues can occur in places which are supervised and unsupervised. For example, abuse may occur in toilets, corridors, changing areas, common rooms, outside spaces such as the playground and sports facilities, and when CYP are travelling home.

We aim to reduce the likelihood of child-on-child abuse through:

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Pupils will be taught through relationships, and sex education (RSE) and our Personal, Social and Health Education (PSHE) curriculum, to understand, in an age-appropriate way, what harmful sexual behaviour is, including by peers. They will be taught the knowledge they need to recognise and report abuse, including emotional, physical, and sexual abuse. Schools will also teach them about the importance of making sensible decisions to stay safe (including online), whilst being clear that if a CYP is abused it is never their fault.

We help our pupils to develop the skills to understand:

- what constitutes harmful sexual behaviour;
- that such behaviour is not acceptable;
- the possible reasons for such behaviour, and vulnerability of perpetrators;
- that they must tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable and must tell a trusted adult if they witness such behaviour towards others.

Pupils may not always feel able to talk to adults about child-on-child sexual abuse. To help them, we will encourage them to share their thoughts and opinions, respond to their concerns, and respect and listen to them. We want our pupils to feel confident that any concerns they raise will be responded to appropriately.

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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the DSL using the school's child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL, advice and guidance will be sought from Children's Social Care and where it is clear a crime has been committed or there is a risk of crime being committed, the Police will be contacted.

Working with external agencies schools will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils, then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

**30. Allegations against pupils**

If an allegation is made against a pupil, we will follow the procedures in the Behaviour Policy with regards to sanctions that may need to be applied.

Where there is a risk of significant harm, a child-on-child referral will be made to Children's Services for either victim, perpetrator or both.

If it is necessary for a child to be interviewed by the police, or other authorities, school will ensure that parents/carers are informed as soon as possible, following advice from external agencies and that the child is supported by an appropriate adult during the interview. The safety and welfare of the child will always be carefully considered by school.

**31. Dealing with Disclosures**

**If a pupil asks to speak to you about a problem, do not promise confidentiality but explain that it may be necessary to consult a colleague.**

**Receive**

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Listen quietly and actively, giving your undivided attention. Allow silences when needed. Do not show shock or disbelief but take what is said seriously.

**Reassure**

Stay calm, no judgements, empathise. **Never make a promise that you can keep what a child has said a secret.** Give reassurance that only those who need to know will be told. Reassure the young person that they were right to tell you.

**React**

React to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but don't interrogate for full details.

Don't ask leading questions – keep the open questions e.g. 'is there anything else you want to say?'

Ask questions only to seek clarity if required; **TED** is a useful tool to use to ensure questions remain open

| T | E | D |
|---|---|---|
| **T**ell me… | **E**xplain about ……. | **D**escribe when, where ……. |

Do not criticize the perpetrator; the pupil may have affection for him/her.

Explain what you will do next – inform designated safeguarding lead, keep in contact.

**Record**

If possible, make brief notes about what they are telling you at the time.

Keep these notes, however rough they are.

If you are unable to make notes at the time, write down what was said as soon as you can.

Using CPOMS, note the **time, date and place** along with what **actions or behaviours**, **statements** or **conversations heard** which have given rise to the concerns. Notify the DSL through CPOMS and by having a conversation with them.

Try to record what was said by the pupil rather than your interpretation of what they are telling you. For example, if a child has called a body part by an unfamiliar name, this should be written phonetically. Make a note of any accompanying non-verbal behaviour and how the information was imparted recreating the 'voice of the child' on the page.

Record the date, time, place and any noticeable nonverbal behaviour.

Be mindful of the time the allegation is received. Whilst the child is at school, they are safe, but assessment may be needed involving other agencies to ascertain whether it is safe for the child to return home. So, a verbal report to the DSL should be made rather than delay this for a written report.

In the event of child-on-child abuse, staff should be mindful of the language they use when reporting the events. Avoid terms such as "perpetrator" and "victim" as both children may be vulnerable and to require support. Rather use pupil 1 and pupil 2.

All records are kept on CPOMS and their security is reviewed at least termly.

**Report**

Report the incident to the Designated Safeguarding Lead and do not tell any other adults or pupils what you have been told.

**Any allegation / disclosure regarding a member of staff MUST be referred immediately to the Headteacher who will consult with the LADO before taking action.**

**Any allegation / disclosure regarding the Headteacher MUST be referred immediately to the Executive Safeguarding Lead who will consult with the LADO and the ODST HR Manager without notifying the headteacher.**

**Never attempt to carry out an investigation of suspected abuse by interviewing the young person or any others involved. This is a highly skilled role and any attempts by yourself could affect possible criminal proceedings.**

**If there is immediate risk of harm to a child, staff should NOT DELAY and must ring 999.**

- **Record Keeping**

The Designated Safeguarding Lead is responsible for ensuring that CPOMS entries are kept confidentially and that they are a coherent factual record of the concerns raised. These records are transferred onto the next school at the point of transfer either through the CPOMS system to other CPOMS schools or are downloaded as a paper copy. See appendix 8 for more information.

- https://schoolsweb.buckscc.gov.uk/safeguarding-zone/safeguarding-in-education/safeguarding-toolkit/retention-of-records/
- https://www.milton-keynes.gov.uk/assets/attach/60432/Child-Protection-Record-Keeping-Guidance-for-Schools-May-2019.pdf

## Appendix A – Definitions

### A. Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such asneighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongstchildren and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities ratherthan simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

### B. Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimescommitted against them or for crimes they have witnessed. There are age appropriate guides to support children 5-11-year olds .

Making child arrangements via the family courts following separation can be stressful andentrench conflict in families. This can be stressful for children. The Ministry of Justice haslaunched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### C. Children frequently absent or who become absent from education, home or care

All staff should be aware that children frequently absent or who become absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a persistently absent child becoming a child absent from education in future. Staff should be aware of their school's unauthorised absence and children absent from education policies.

Schools should be mindful of guidance on school attendance "Working together to improve school attendance" and the ODBST attendance strategy.

### D. Children with family members in custody

Approximately 200,000 children have a parent in custody each year. Trustees are clear of the increased risk for these children of poverty, stigma, isolation and poor mental health. These frequently lead to poor outcomes in school in academic success, social skills and relationships and in the behaviours presented in lessons and more generally around school.

ODBST schools will support pupils with parents or carers in custody through targeted work with individuals and peer groups. Support and resources to support schools and teachers are available through the National Information Centre on Children of Offenders (NICCO).

NICCO

https://www.nicco.org.uk/

Homelessness Reduction Act: policy factsheets - https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets

**E. Child sexual exploitation (CSE)**

Sexual exploitation is a form of sexual abuse in which young people are exploited, coerced and/or manipulated into engaging in some form of sexual activity in return for something they need or desire and/or for the gain of a third party. The "something" received by the child or young person can include both tangible items such as food, somewhere to stay, drugs, alcohol, cigarettes or money and more intangible "rewards" such as perceived affection, protection or a sense of value of belonging. Fear of what might happen if they do not comply can also be a significant influencing factor.

Sexual exploitation can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online without the child's immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.

Sexual exploitation can manifest itself in many different forms, including grooming, abuse by an individual who has established a "seemingly consensual" relationship with a child or young person, informal "introductions" to other (potential) abusers and the formal prostitution of a child. Children and young people can also find themselves exploited through the production and distribution of sexual images or through exposure to such images. Common to all these scenarios is an imbalance of power in favour of the abuser and some degree of coercion, intimidation, exploitation, violence and/or enticement of the child or young person.

**Key Facts about CSE**

- Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
- It affects both girls and boys and can happen in all communities.
- Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with Disabilities.
- Victims of CSE may also be trafficked (locally, nationally and internationally).
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

**Good practice – Individuals**

- Recognise the symptoms and distinguish them from other forms of abuse;
- Treat the child/young person as a victim of abuse;
- Understand the perspective / behaviour of the child/young person and be patient with them;

- Help the child/young person to recognise that they are being exploited;
- Collate as much information as possible;
- Share information with other agencies and seek advice / refer to Social Care.

**Good practice – Organisations**

- Ensure robust safeguarding policies and procedures are in place which cover CSE;
- Promote and engage in effective multi-agency working to prevent abuse;
- Work to help victims move out of exploitation;
- Cooperate to enable successful investigations and prosecutions of perpetrators.

Further information on signs of a child's involvement in sexual exploitation is available inHome Office guidance: Child sexual exploitation: guide for practitioners

**F. Child Criminal Exploitation (CCE)**

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and

children who regularly miss school or education or do not take part in education.

**G. Child-on-child sexual violence and sexual harassment (Harmful Sexual Behaviours – HSB)**

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. This can include (but is not limited to):

> *bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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 and initiation/hazing type violence and rituals.*

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Staff working with children should maintain an attitude of 'it could happen here' where HSB is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

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. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

It is essential that all victims 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.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and school staff are supported and protected as appropriate.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and children are at greater risk (section 23 & 24).

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, willnever be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”,“part of growing up”, “just having a laugh” or “boys being boys”; and,
- 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.

<u>i. Sexual violence</u>

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003[135] as describedbelow:

- **Rape**: A person (A) commits an offence of rape if: he intentionally penetrates the vagina,anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration**: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and Adoes not reasonably believe that B consents.
- **Sexual Assault**: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someonewithout consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another

person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A doesnot reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

- **What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent
- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

ii. Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. 139 It may include:
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.140 As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
- sharing of unwanted explicit content;
- upskirting (is a criminal offence);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Governing bodies and proprietors should be aware of the department advice: *Sexual violence and sexual harassment between children in schools and colleges* This emphasises the need for effective training and policies in schools and colleges; the need for schools / colleges to respond on a case-by-case basis, supported by children's social care and the police if required.

It breaks the requirement for schools down into bite size pieces.

i. **The immediate response to a report**

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims 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.

Clarity should be given to how all staff should be trained to manage a report, as with any safeguarding concern.

Partner agencies should be contacted to coordinate support for the children involved this may include a referral to FRT and/the Police.

ii. **Risk Assessment**

Following a report of sexual violence, the DSL (or deputy) should make an immediate assessment of risk and assess the needs of the children concerned accordingly, planning in the first instance must include the identified needs of the:

- the victim;
- the alleged perpetrator;
- all other children (and if appropriate adult students and staff).

All risk assessments should be recorded and regularly reviewed as more information comes to light or circumstances change. The DSL (or deputy) should ensure they are engaging with children's social care and specialist services as part of the plan of support for the children involved. Clear records need to be retained along with a chronology.

iii. **Action following a report of sexual violence and/or sexual harassment**

**What to consider**

Schools should consider:

- the wishes of the victim in terms of how they want to proceed. A child's wish not to proceed however will need to be balanced against the need for protection. School/college will need to escalate concerns to FRT/Police if there is a risk of harm or a crime has been committed, a child and their family may need support to understand the duty of care the school/college holds;
- the nature of the alleged incident;
- the ages of the children involved;
- the development stages of the children involved;
- any power imbalance between the children;
- is the incident a one-off or a sustained pattern of abuse?
- ongoing risks to the victim, intra-familial harms and support for siblings, other children, school or college staff following incidents~~?~~
- contextual safeguarding issues.

A child centred approach is needed throughout and staff may need support in managing this emotive issue. Support around use of language is crucial. It is rarely helpful to describe children's activities using adult terms such as perpetrator and victim. This has to be balanced with the need to ensure there is a clear understanding that sexual violence and sexual harassment is not acceptable and will not be tolerated.

iv. **Options to manage the report**

Four scenarios for schools and colleges have been included to support staff to consider when managing any reports of sexual violence and/or sexual harassment.

- *Manage internally – the school manages incidents.*
- *Family help/early help – multi-agency family help/early help*
- *Referrals to children's social care*
- *Reporting to the police – in parallel to children's social care*

v. **Considering bail conditions**

It is unlikely that a child will be on police bail with conditions attached, so it is essential that when there is a criminal investigation there is joined up working between the school or college, children's social care and the police to ensure all children involved are supported.

vi. **Managing any delays in the criminal process**

There may be delays in any criminal case but schools and colleges **should not wait** for the outcome before putting protective measures in place.

vii. **The end of the criminal process**

Regardless of whether a child is convicted of a crime or not, all the children involved should be protected.

viii. **Ongoing response for the victim**

Appropriate support should be available on an ongoing basis to the victim. The guidance includes sources of specific support. The guidance makes it clear that schools need to consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at school or college.

ix. **Safeguarding and supporting the alleged perpetrator**

Schools need to manage the balance between supporting the victim and ensuring the rights of the alleged perpetrator to an education.

iii. Upskirting (Youth produced sexual imagery – Sexting)

Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'.

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons' clothing (not necessarily a skirt) without their permission and or knowledge, withthe intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. Producing and sharing sexual images of under 18s is illegal.

The response to these incidents will be guided by the principle of proportionality and the primary concern **at all times** of the welfare and protection of the young people involved. However, when an incident involving children or young people produced sexual imagery comes to a school's attention:

- The incident should be referred to the Designated Person as soon as possible;
- The Designated Safeguarding Lead should hold an initial review meeting with appropriate school staff;
- There should be subsequent interviews with the young people involved (if appropriate);
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult;
- There is good 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 education needs);
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under.

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

iv. Toolkits & Policies

- ODBST L3 Peer-on-Peer Abuse/Sexual Harassment and Violence Policy Guidance (2021)
- Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs anddisabilities.
- Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guidedesigned to explore problematic online sexual behaviour with 9-12 year olds.
- Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, thetoolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- NSPCC - Harmful sexual behaviour framework An evidence-informed frameworkfor children and young people displaying HSB.
- Contextual Safeguarding Network – Beyond Referrals - Schools levers foraddressing HSB in schools.

**H. County lines (Child Drug Exploitation) including Modern Slavery**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and

money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their 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 that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

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

The Children's Society in partnership with Victim Support and National Police Chiefs' Council have developed a County Lines Toolkit For Professionals

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office

Modern Human Slavery/Human Trafficking

Modern slavery encompasses human trafficking and slavery, servitude and forced orcompulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

1. A sometimes-overlooked avenue of child protection is that of human trafficking[2] which can be used where a child or young person (including those aged 18 or over) has been trafficked for the purpose of sexual exploitation. Under this legislation, it is an offence to arrange or facilitate the travel of another person with a view to their being exploited, whether or not the victim consents to the travel. This covers entering, departing or travelling within any country or when a child is moved from one city to another within the UK. The offence covers recruiting, transporting, transferring, harbouring, receiving or exchanging control of that person.
2. The United Nations defines human trafficking as the recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose including slavery, servitude and forced or compulsory labour, or sexual exploitation. It takes on many forms today:

[2] To simplify and condense human trafficking offences, The Modern Slavery Act 2015 introduced one offence of human trafficking covering sexual and non-sexual exploitation. Trafficking Offences contained in the Sexual Offences Act 2003 and The Protection of Freedoms Act 2012 have now been repealed and replaced by the offence of Human Trafficking

- Domestic Servitude - Employees working in private homes are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
- Forced Labour - Human beings are forced to work under the threat of violence and for no pay. These slaves are treated as property and exploited to create a product for commercial sale.
- Child Labour and enslavement — whether forced labour, domestic servitude, bonded labour or sex trafficking — of a child.
- Sex Trafficking - Women, men or children that are forced into the commercial sex industry and held against their will by force, fraud or coercion.
- Bonded Labour - Individuals that are compelled to work to repay a debt and unable to leave until the debt is repaid. It is the most common form of enslavement in the world.
- Forced Marriage – Women and children who are forced to marry another person without their consent or against their will (see F). This is frequently underage and is linked to children missing from education (for details see H and ODST policy guidance)

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the ModernSlavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk**)**

**I. Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but areenabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing aschool's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet trafficfrom multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses,spyware, ransomware, botnets and Remote Access Trojans with the intent tocommit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertentlyor deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where youngpeople are at risk of committing, or being drawn into, low level cyber-dependent offencesand divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud,purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NSPCC- When to call the Police' andNational Cyber Security Centre - NCSC.GOV.UK

**J. Domestic abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impactof domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Types of domestic abuse include intimate partner violence, 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 sexual identity, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for theabuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance andsupport for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and howthey can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includesinformation for adult victims, young people facing abuse in their own relationshipsand parents experiencing child to parent violence/abuse)
- Operation Encompass operates in all police forces across England to help police and schools work together when the police are called to an incident of domestic abuse.

**K. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at riskof homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and inaccordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: here

Bucks Home Choice - https://www.buckshomechoice.org.uk/choice/

Buckinghamshire Council

- South Bucks Area, Housing Options Team - 01895 837200 (emergency / out of hours): 01895 837200
- Aylesbury Vale Housing Team - 01296 585168. (emergency / out of hours): 0800 9997677
- Chiltern Area Housing Team - 0808 164 1810.
- Wycombe Area Housing Team - 01494 421212 (emergency / out of hours): 0800 999 7677

MK Housing: https://www.milton-keynes.gov.uk/housing
Milton Keynes
Civic Offices 1 Saxon Gate East Central Milton Keynes MK9 3EJ
01908 263481

**L. So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

As a Trust we are aware of the cultural diversity of the community around our schools and seek to work sensitively to address the unique culture of our pupils and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse linked to a belief in spirit possession on the part of their parent, carer or wider community.

We are aware of the harm to children that can be caused by practices linked to culture, faith and beliefs and promote awareness through training and access to resources. Our staff will report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

We support pupils, via targeted sessions and delivery through our curriculum, to understand that some aspects of cultural or religious practice and beliefs could cause harm and they should turn to someone they trust or an organisation such as ChildLine for help and support.

Links with local services, community organisations and faith leaders to provide support and helpful information on what is safe and unsafe practice within the culture/faith, groups of our school community.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

i. Female Genital Mutilation FGM

FGM is child abuse and a form of violence against women and girls and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for **any person (regardless of their nationality or residence status)** to:

- perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
- assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
- Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a **UK national or permanent UK resident** (section 3 of the Act).

FGM mandatory reporting duty for teachers: If a teacher, in the course of their work in the profession, discovers, either through disclosure by the victim or through visual evidence, that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. Thise failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence and school staff should not be examining pupils. Information on when and how to make a report can be found at www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

This duty does not apply in relation to at risk or suspected cases (ie where a teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures.

ii. Forced marriages (FM)

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone experiences duress to marry (physical, psychological, financial, sexual and emotional pressure (e.g. if someone is made to feel like they're bringing shame on their family). In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced. Honour-based abuse can be a trigger for a forced marriage.

It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial "marriages" as well as legal marriages.

In an arranged marriage, the families of both prospective spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the couple.

FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the marriage takes place);
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).

**M. Mental Health**

The ODBST recognises that safeguarding and promoting the welfare of children includes preventing impairment of children's mental health alongside all other safeguarding concerns when assessing risk and determining appropriate interventions.

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. Whilst only appropriately trained professionals should attempt to diagnose mental health conditions, all staff have a central role to play in enabling their pupils to be resilient and to support good mental health and wellbeing. Where staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the school's safeguarding procedures and reporting the concern to the DSL. The DSL will work in partnership with the school Mental Health Lead, parents/carers, social care and, where possible, other relevant agencies to ensure that children receive appropriate support at the earliest opportunity. The ODBST recognises that children experiencing mental health difficulties may face additional barriers to learning, attendance and engagement and will adopt a child-centred, trauma-informed approach when considering need and support arrangements. It is important that schools promote good mental wellbeing for all pupils. Education about relationships, sex and health can be important vehicles through which schools can teach pupils about mental health and wellbeing.

A school's approach to mental health and behaviour should be part of a consistent whole school approach to mental health and wellbeing. This should involve providing a structured school environment with clear expectations of behaviour, well communicated social norms and routines, which are reinforced with highly consistent consequence systems. This should be paired with an individualised graduated response when the behavioural issues might be a result of educational, mental health, other needs or vulnerabilities.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Resources

- Mental health and behaviour in schools
- Promoting children and young people's emotional health and wellbeing
- Rise Above

**N. Preventing radicalisation**

Every school will write a Prevent risk assessment and update this annually, or more often in response to changing local or national need.

All staff will undertake annual Prevent training.

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from becoming terrorists or supporting terrorism, should be a part of a schools' or colleges' safeguarding approach. Schools should be mindful that vulnerable pupils are more likely to find themselves susceptible to radicalisation; early warning signs must be acted upon without delay and appropriate support put in place.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person legitimises support for, or use of, terrorist violence;
- 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 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.

i. Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

ii. Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawninto terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative fromthe school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The Designated Safeguarding Lead should consider if it would be appropriate to share anyinformation with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: Channel guidance

iii. Prevent – (The Counter Terrorism & Security Act 2015).

The Act places a Prevent duty on specified schools to have "due regard to the need to prevent people from being drawn into terrorism".

We are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and

childcare providers on preventing children and young people from being drawn into terrorism.

Schools subject to the Prevent Duty 2023 will be expected to demonstrate activity in the following areas:

- Assessing the risk of children being drawn into terrorism;
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies;
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board;
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism;
- Expected to ensure children are safe from terrorist and extremist material when accessing the internet in school.

School staff receive training (Prevent awareness e-learning) to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation and our procedures are detailed in the 'ODBST Tackling Extremism & Radicalisation Policy'.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism.

The school Governors , the Headteacher and the Designated Safeguarding Leads (DSLs) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy. ODBST provides guidance on Prevent Risk Assessment processes and recording formats.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted. The Department of Education has also set up a dedicated telephone helpline for staff and Governors to raise concerns around PREVENT (020 7340 7264).

The generic email address to make referrals across the Thames Valley area is:
preventgateway@thamesvalley.police.uk
This email box is monitored during office hours Monday to Friday

For any urgent queries, schools can contact the police non-emergency line on 101 and ask for a member of Prevent Team, Counter Terrorism Policing.

Guidance

http://www.bucks-lscb.org.uk/professionals/exploitation/prevent-radicalisation/

http://www.bucks-lscb.org.uk/wp-content/uploads/Professionals/Channel-Leaflet-FINAL-professionals-Jan17.pdf

https://www.milton-keynes.gov.uk/your-council-and-elections/council-information-and-accounts/equalities/prevent

**O. Additional Information and Support**

Abuse

- What to do if you're worried a child is being abused – DfE advice
- Domestic abuse: Various Information/Guidance - Home Office (HO)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website
- Tackling Child Sexual Abuse Strategy – Home Office policy paper
- Together we can stop child sexual abuse – HM Government campaign
- Supporting practice in tackling child sexual abuse - Centre of Expertise on Child Sexual Abuse to identify and respond appropriately to concerns of child sexual abuse.

Bullying

- Preventing bullying including cyberbullying - DfE advice

Children missing from education, home or care

- Children missing education - DfE statutory guidance
- Child missing from home or care - DfE statutory guidance
- Children and adults missing strategy - Home Office strategy

Children with family members in prison

- National Information Centre on Children of Offenders - Barnardo's in partnershipwith HM Prison and Probation Service

Child Exploitation

- Trafficking: safeguarding children - DfE and HO guidance
- Care of unaccompanied and trafficked children – DfE statutory guidance
- Modern slavery: how to identify and support victims – HO statutory guidance

Drugs

- Drug strategy 2017 - Home Office strategy
- Information and advice on drugs - Talk to Frank website
- Drug and Alcohol education — teacher guidance & evidence review – PSHEAssociation website

"Honour Based Abuse" including FGM and forced marriage

- Female genital mutilation: information and resources- Home Office guidance
- Female genital mutilation: multi agency statutory guidance - DfE, DH, and HOstatutory guidance
- Forced marriage - Forced Marriage Unit (FMU) statutory guidance
- FGM resource pack – HM Government guidance

Health and Well-being

- Fabricated or induced illness: safeguarding children - DfE, DH, HO
- Rise Above: Free PSHE resources on health, wellbeing and resilience - PublicHealth England
- Medical-conditions: supporting pupils at school - DfE statutory guidance
- Mental health and behaviour - DfE advice

Homelessness

- Homelessness: How local authorities should exercise their functions -

Ministry of Housing, Communities & Local Government guidance

Private fostering

- Private fostering: local authorities - DfE statutory guidance

Radicalisation

- Prevent duty guidance- Home Office guidance
- Prevent duty: additional advice for schools and childcare providers - DfE advice
- Educate Against Hate website - DfE and Home Office advice
- Prevent for FE and Training - Education and Training Foundation (ETF)

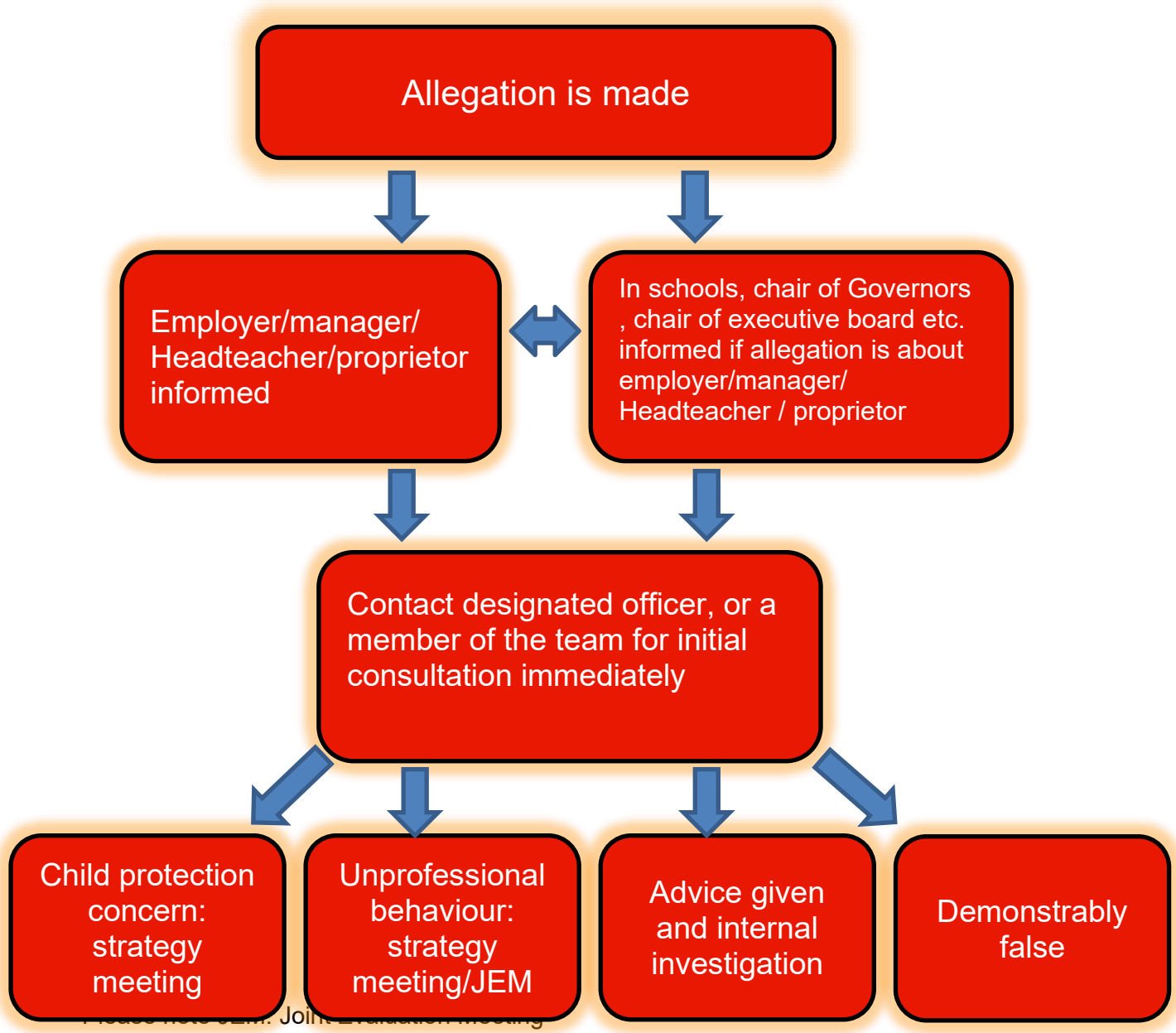
Violence

- Serious violence strategy - Home Office Strategy
- Factors linked to serious violence and how these factors can be used to identifyindividuals for intervention – Home Office
- Youth Endowment Fund – Home Office
- Gangs and youth violence: for schools and colleges - Home Office advice
- Ending violence against women and girls 2016-2020 strategy - Home Officestrategy
- Violence against women and girls: national statement of expectations for victims -Home Office guidance
- Sexual violence and sexual harassment between children in schools and colleges-DfE advice

**Appendix B**

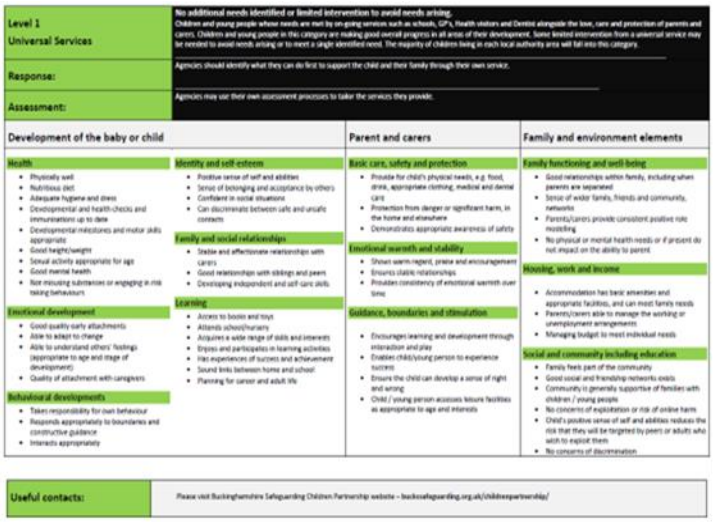
**Allegation flowchart**

Below is a procedure to follow if you have a concern that a person who works with children and young people may have behaved inappropriately or you have received information that may constitute an allegation you must:




Please note JEM: Joint Evaluation meeting

# Appendix C Threshold Document - Accessing Services for Children in Buckinghamshire



**Level 1 Universal Services**

No additional needs identified or limited intervention to avoid needs arising.

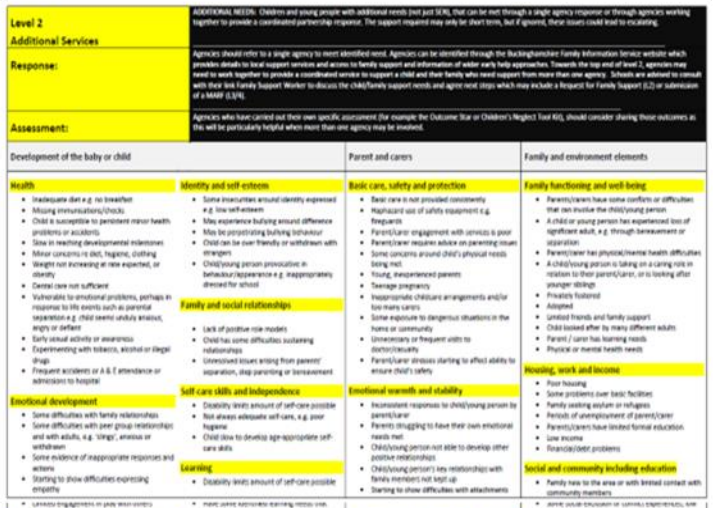
Children and young people whose needs are met by on-going services such as schools, GP's, Health visitors and Dentist alongside the love, care and protection of parents and carers. Children and young people in this category are making good overall progress in all areas of their development. Some limited intervention from a universal service may be needed to avoid needs arising or to meet a single identified need. The majority of children living in each local authority area will fall into this category.

**Response:** Agencies should identify what they can do first to support the child and their family through their own service.

**Assessment:** Agencies may use their own assessment processes to take the services they provide.

| Development of the baby or child | | Parent and carers | Family and environment elements |
|---|---|---|---|
| **Health**<br>• Physically well<br>• Nutritious diet<br>• Adequate hygiene and dress<br>• Developmental and health checks and immunisations up to date<br>• Developmental milestones and motor skills appropriate<br>• Good height/weight<br>• Sexual activity appropriate for age<br>• Good mental health<br>• Not misusing substances or engaging in risk taking behaviours<br>**Emotional development**<br>• Good quality early attachments<br>• Able to adapt to change<br>• Able to understand others' feelings (appropriate to age and stage of development)<br>• Quality of attachment with caregivers<br>**Behavioural developments**<br>• Takes responsibility for own behaviour<br>• Responds appropriately to boundaries and constructive guidance<br>• Interacts appropriately | **Identity and self-esteem**<br>• Positive sense of self and abilities<br>• Sense of belonging and acceptance by others<br>• Confident in social situations<br>• Can discriminate between safe and unsafe contexts<br>**Family and social relationships**<br>• Stable and affectionate relationships with carers<br>• Good relationships with siblings and peers<br>• Developing independent and self-care skills<br>**Learning**<br>• Access to books and toys<br>• Attends school/nursery<br>• Acquires a wide range of skills and interests<br>• Enjoys and participates in learning activities<br>• Has experiences of success and achievement<br>• Sound links between home and school<br>• Planning for career and adult life | **Basic care, safety and protection**<br>• Provide for child's physical needs, e.g. food, drink, appropriate clothing, medical and dental care<br>• Protection from danger or significant harm, in the home and elsewhere<br>• Demonstrates appropriate awareness of safety<br>**Emotional warmth and stability**<br>• Shows warm regard, praise and encouragement<br>• Ensures stable relationships<br>• Provides consistency of emotional warmth over time<br>**Guidance, boundaries and stimulation**<br>• Encourages learning and development through interaction and play<br>• Enables child/young person to experience success<br>• Ensures the child can develop a sense of right and wrong<br>• Child / young person accesses leisure facilities as appropriate to age and interests | **Family functioning and well-being**<br>• Good relationships within family, including when parents are separated<br>• Sense of wider family, friends and community, networks<br>• Parents/carers provide consistent positive role modelling<br>• No physical or mental health needs or if present do not impact on the ability to parent<br>**Housing, work and income**<br>• Accommodation has basic amenities and appropriate facilities, and can meet family needs<br>• Parents/carers able to manage the working or unemployment arrangements<br>• Managing budget to meet individual needs<br>**Social and community including education**<br>• Family feels part of the community<br>• Good social and friendship networks exists<br>• Community is generally supportive of families with children / young people<br>• No concerns of exploitation or risk of online harm<br>• Child's positive sense of self and abilities reduces the risk that they will be targeted by peers or adults who wish to exploit them<br>• No concerns of discrimination |

**Useful contacts:** Please visit Buckinghamshire Safeguarding Children Partnership website – buckssafeguarding.org.uk/childrenpartnership/



**Level 2 Additional Services**

ADDITIONAL NEEDS: Children and young people with additional needs (not just SEN), that can be met through a single agency response or through agencies working together to provide a coordinated partnership response. The support required may only be short term, but if ignored, these issues could lead to escalating.

**Response:** Agencies should refer to a single agency to meet identified need. Agencies can be identified through the Buckinghamshire Family Information Service website which provides details to local support services and access to family support and information of wider early help approaches. Towards the top end of level 2, agencies may need to work together to provide a coordinated service to support a child and their family who need support from more than one agency. Schools are advised to consult with their link Family Support Worker to discuss the child/family support needs and agree next steps which may include a Request for Family Support (L2) or submission of a MARF (L3/4).

**Assessment:** Agencies who have carried out their own specific assessment (for example the Outcome Star or Children's Neglect Tool Kit), should consider sharing those outcomes as this will be particularly helpful when more than one agency may be involved.

| Development of the baby or child | | Parent and carers | Family and environment elements |
|---|---|---|---|
| **Health**<br>• Inadequate diet e.g. no breakfast<br>• Missing immunisations/checks<br>• Child is susceptible to persistent minor health problems or accidents<br>• Slow in reaching developmental milestones<br>• Minor concerns re diet, hygiene, clothing<br>• Weight not increasing at rate expected, or obesity<br>• Dental care not sufficient<br>• Vulnerable to emotional problems, perhaps in response to life events such as parental separation e.g. child seems unduly anxious, angry or defiant<br>• Early sexual activity or awareness<br>• Experimenting with tobacco, alcohol or illegal drugs<br>• Frequent accidents or A & E attendance or admission to hospital<br>**Emotional development**<br>• Some difficulties with family relationships<br>• Some difficulties with peer group relationships and with adults, e.g. 'clingy', anxious or withdrawn<br>• Some evidence of inappropriate responses and actions<br>• Starting to show difficulties expressing empathy<br>**Behavioural developments**<br>• Not always able to understand how own actions impact on others<br>• Finds accepting responsibility for own actions difficult<br>• Responds inappropriately to boundaries and constructive guidance<br>• Finds positive interaction difficult with peers in unstructured contexts | **Identity and self-esteem**<br>• Some insecurities around identity expressed e.g. low self-esteem<br>• May experience bullying around difference<br>• May be perpetrating bullying behaviour<br>• Child can be over-friendly or withdrawn with strangers<br>• Child/young person provocative in behaviour/appearance e.g. inappropriately dressed for school<br>**Family and social relationships**<br>• Lack of positive role models<br>• Child has some difficulties sustaining relationships<br>• Unresolved issues arising from parents' separation, step-parenting or bereavement<br>**Self-care skills and independence**<br>• Disability limits amount of self-care possible<br>• Not always adequate self-care, e.g. poor hygiene<br>• Child slow to develop age-appropriate self-care skills<br>**Learning**<br>• Disability limits amount of self-care possible<br>• Some early educational learning needs risk result in a school level response<br>• Language and communication difficulties<br>• Some school absence<br>• Poor punctuality/pattern of regular school absences<br>Not always engaged in play/learning, e.g. poor concentration<br>• Not thought to be reaching his/her education potential<br>• Reduced access to books/toys<br>• Home-School link(s) not well established<br>• Limited evidence of progression planning<br>• At risk of making poor decision about progression<br>• Limited participation of young person in education, employment or training | **Basic care, safety and protection**<br>• Basic care is not provided consistently<br>• Haphazard use of safety equipment e.g. fireguards<br>• Parent/carer engagement with services is poor<br>• Parent/carer requires advice on parenting issues<br>• Some concerns around child's physical needs being met<br>• Young, inexperienced parents<br>• Teenage pregnancy<br>• Inappropriate childcare arrangements and/or low-many carers<br>• Some exposure to dangerous situations in the home or community<br>• Unnecessary or frequent visits to doctor/casualty<br>• Parent/carer stresses starting to affect ability to ensure child's safety<br>**Emotional warmth and stability**<br>• Inconsistent responses to child/young person by parent/carer<br>• Parents struggling to have their own emotional needs met<br>• Child/young person not able to develop other positive relationships<br>• Child/young person's key relationships with family members not kept up<br>• Starting to show difficulties with attachments<br>**Guidance, boundaries and stimulation**<br>• Parent/carer offers inconsistent boundaries<br>• Lack of routine in the home<br>• Child/young person spends considerable time alone, e.g. watching television<br>• Child / young person is not often exposed to new experiences, has limited access to leisure activities<br>• Child / young person can behave in an anti-social way in the neighbourhood, e.g. petty crime<br>• Possible risk of online harm | **Family functioning and well-being**<br>• Parents/carers have some conflicts or difficulties that can involve the child/young person<br>• A child or young person has experienced loss of significant adult, e.g. through bereavement or separation<br>• Parent/carer has physical/mental health difficulties<br>• A child/young person is taking on a caring role in relation to their parent/carer, or is looking after younger siblings<br>• Privately fostered<br>• Adopted<br>• Limited friends and family support<br>• Child looked after by many different adults<br>• Parent / carer has learning needs<br>• Physical or mental health needs<br>**Housing, work and income**<br>• Poor housing<br>• Some problems over basic facilities<br>• Family seeking asylum or refugees<br>• Periods of unemployment of parent/carer<br>• Parents/carers have limited formal education<br>• Low income<br>• Financial/debt problems<br>**Social and community including education**<br>• Family new to the area or with limited contact with community members<br>• Some social exclusion or cultural experiences, low tolerance<br>• Community characterised by negatively towards children/young people<br>• Difficulty accessing community facilities<br>• Child has a negative sense of self and abilities and suffers with low self-esteem making them vulnerable to peers and adults who pay them attention and/or show them affection but do so in order to exploit them (CE).<br>• Some concerns of possible discrimination |

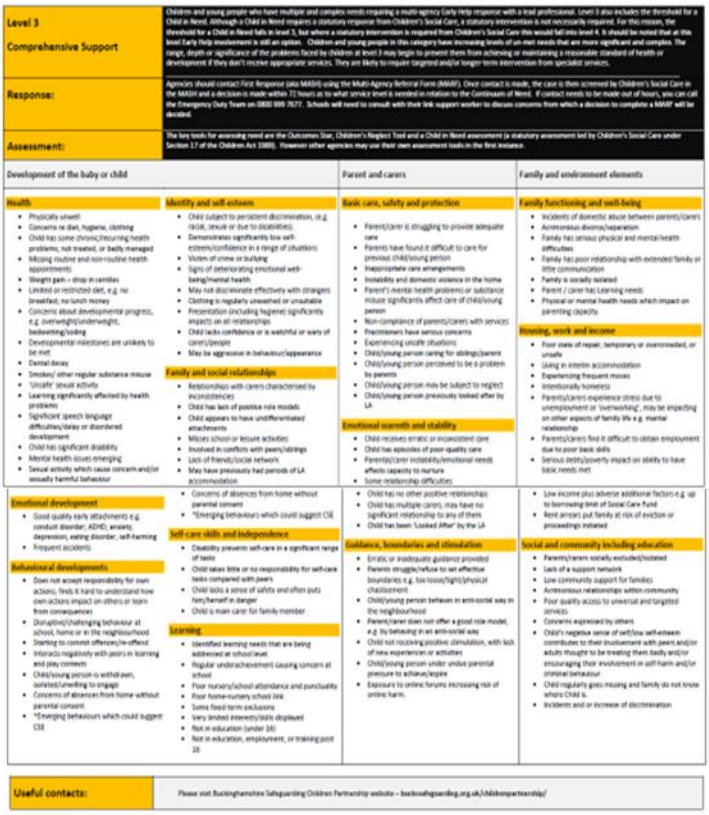
**Useful contacts:** Please visit Buckinghamshire Safeguarding Children Partnership website – buckssafeguarding.org.uk/childrenpartnership/



**Areas of Concern:**

Other areas of concern that will need to be considered in terms of their impact and level of risk include:

- Behaviour
- Child exploitation
- Development
- Disability
- Domestic abuse
- Education
- Emotional well-being
- Female genital Mutilation
- Forced Marriage
- Gangs
- Honour based violence
- Housing
- Legal status
- Missing
- Neglect
- Offending
- Online risk
- Parental mental health
- Parenting
- Perplexing presentations (fabricated illness)
- Physical abuse
- Physical Health
- Radicalisation
- Relationships (social context)
- Self-harm
- Sexual abuse
- Sexual health
- Substance misuse
- Young Carer



**Level 3 Comprehensive Support**

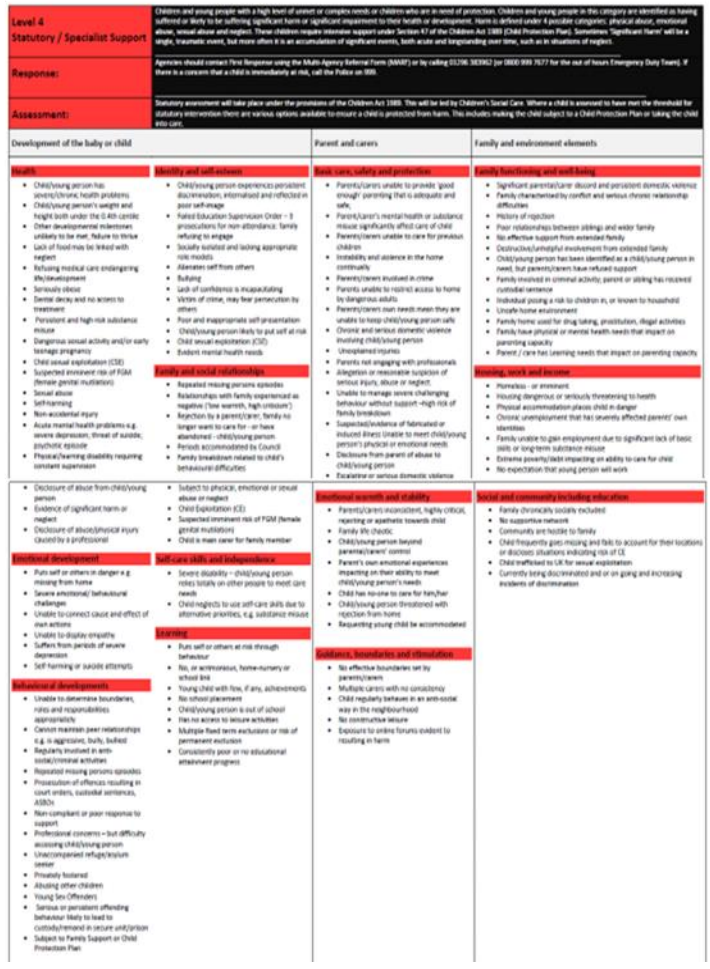
Children and young people who have multiple and complex needs requiring a multi-agency Early Help response with a lead professional. Level 3 also includes the threshold for a Child in Need. Although a Child in Need requires a statutory response from Children's Social Care, a statutory intervention is not necessarily required. For this reason, the threshold for a Child in Need falls in level 3, but where a statutory intervention is required from Children's Social Care this would fall into level 4. It should be noted that at this level Early Help involvement is still an option. Children and young people in this category have increasing levels of un-met needs that are more significant and complex. The range, depth or significance of the problems faced by children at level 3 may begin to prevent them from achieving or maintaining a reasonable standard of health or development if they don't receive appropriate services. They are likely to require targeted and/or longer-term intervention from specialist services.

**Response:** Agencies should contact First Response (aka MASH) using the Multi-Agency Referral Form (MARF). Once contact is made, the case is then screened by Children's Social Care in the MASH and a decision is made within 72 hours as to what service level is needed in relation to the Continuum of Need. If contact needs to be made out of hours, you can call the Emergency Duty Team on 0800 999 7677. Schools will need to consult with their link support worker to discuss concerns from which a decision to complete a MARF will be decided.

**Assessment:** The key tools for assessing need are the Outcomes Star, Children's Neglect Tool and a Child in Need assessment (a statutory assessment led by Children's Social Care under Section 17 of the Children Act 1989). However other agencies may use their own assessment tools in the first instance.

| Development of the baby or child | | Parent and carers | Family and environment elements |
|---|---|---|---|
| **Health**<br>• Physically unwell<br>• Concerns re diet, hygiene, clothing<br>• Child has some chronic/recurring health problems, not treated, or badly managed<br>• Missing routine and non-routine health appointments<br>• Weight gain – drop in centiles<br>• Limited or restricted diet, e.g. no breakfast, no lunch money<br>• Concerns about developmental progress, e.g. overweight/underweight, bedwetting/soiling<br>• Developmental milestones are unlikely to be met<br>• Dental decay<br>• Smokes/ other regular substance misuse<br>• 'Unsafe' sexual activity<br>• Learning significantly affected by health problems<br>• Significant speech language difficulties/delay or disordered development<br>• Child has significant disability<br>• Mental health issues emerging<br>• Sexual activity which cause concern and/or sexually harmful behaviour<br>**Emotional development**<br>• Good quality early attachments e.g. conduct disorder; ADHD; anxiety, depression, eating disorder, self-harming<br>• Frequent accidents<br>**Behavioural developments**<br>• Does not accept responsibility for own actions; finds it hard to understand how own actions impact on others or learn from consequences<br>• Disruptive/challenging behaviour at school, home or in the neighbourhood<br>• Starting to commit offences/re-offend<br>• Interacts negatively with peers in learning and play contexts<br>• Child/young person is withdrawn, isolated/unwilling to engage<br>• Concerns of absences from home without parental consent<br>• *Emerging behaviours which could suggest CSE | **Identity and self-esteem**<br>• Child subject to persistent discrimination, e.g. racial, sexual or due to disabilities).<br>• Demonstrates significantly low self-esteem/confidence in a range of situations<br>• Victim of crime or bullying<br>• Signs of deteriorating emotional well-being/mental health<br>• May not discriminate effectively with strangers<br>• Clothing is regularly unwashed or unsuitable<br>• Presentation (including hygiene) significantly impacts on all relationships<br>• Child lacks confidence or is watchful or wary of carers/people<br>• May be aggressive in behaviour/appearance<br>**Family and social relationships**<br>• Relationships with carers characterised by inconsistences<br>• Child has lack of positive role models<br>• Child appears to have undifferentiated attachments<br>• Misses school or leisure activities<br>• Involved in conflicts with peers/siblings<br>• Lack of friends/social network<br>• May have previously had periods of LA accommodation<br>**Self-care skills and independence**<br>• Disability presents self-care in a significant range of tasks<br>• Child takes little or no responsibility for self-care tasks compared with peers<br>• Child lacks a sense of safety and often puts him/herself in danger<br>• Child is main carer for family member<br>**Learning**<br>• Identified learning needs that are being addressed at school level.<br>• Regular underachievement causing concern at school<br>• Poor nursery/school attendance and punctuality<br>• Poor home-nursery school link<br>• Some fixed term exclusions<br>• Very limited interests/skills displayed<br>• Not in education (under 16)<br>• Not in education, employment, or training post 16 | **Family functioning and well-being**<br>• Incidents of domestic abuse between parents/carers<br>• Acrimonious divorce/separation<br>• Family has serious physical and mental health difficulties<br>• Family has poor relationship with extended family or little communication<br>• Family is socially isolated<br>• Parent / carer has Learning needs<br>• Physical or mental health needs which impact on parenting capacity.<br>**Housing, work and income**<br>• Poor state of repair, temporary or overcrowded, or unsafe<br>• Living in interim accommodation<br>• Experiencing frequent moves<br>• Intentionally homeless<br>• Parents/carers experience stress due to unemployment or 'overworking', may be impacting on other aspects of family life e.g. marital relationship<br>• Parents/carers find it difficult to obtain employment due to poor basic skills<br>• Serious debts/poverty impact on ability to have basic needs met<br>• Low income plus adverse additional factors e.g. up to borrowing limit of Social Care Fund<br>• Rent arrears put family at risk of eviction or proceedings initiated<br>**Social and community including education**<br>• Parents/carers socially excluded/isolated<br>• Lack of a support network<br>• Low community support for families<br>• Acrimonious relationships within community<br>• Poor quality access to universal and targeted services<br>• Concerns expressed by others<br>• Child's negative sense of self/low self-esteem contributes to their involvement with peers and/or adults thought to be treating them badly and/or encouraging their involvement in self-harm and/or criminal behaviour<br>• Child regularly goes missing and family do not know where Child is.<br>• Incidents and or increase of discrimination |

**Useful contacts:** Please visit Buckinghamshire Safeguarding Children Partnership website – buckssafeguarding.org.uk/childrenpartnership/



**Level 4 Statutory / Specialist Support**

Children and young people with a high level of unmet or complex needs or children who are in need of protection. Children and young people in this category are identified as having suffered or likely to be suffering significant harm or significant impairment to their health or development. Harm is defined under 4 possible categories: physical abuse, emotional abuse, sexual abuse and neglect. These children require intensive support under Section 47 of the Children Act 1989 (Child Protection Plan). Sometimes 'Significant Harm' will be a single, traumatic event, but more often it is an accumulation of significant events, both acute and longstanding over time, such as in situations of neglect.

**Response:** Agencies should contact First Response using the Multi-Agency Referral Form (MARF) or by calling 01296 383962 (or 0800 999 7677 for the out of hours Emergency Duty Team). If there is a concern that a child is immediately at risk, call the Police on 999.

**Assessment:** Statutory assessment will take place under the provisions of the Children Act 1989. This will be led by Children's Social Care. Where a child is assessed to have met the threshold for statutory intervention there are various options available to ensure a child is protected from harm. This includes making the child subject to a Child Protection Plan or taking the child into care.

| Development of the baby or child | | Parent and carers | Family and environment elements |
|---|---|---|---|
| **Health**<br>• Child/young person has severe/chronic health problems<br>• Child/young person's weight and height both under the 0.4th centile<br>• Other developmental milestones unlikely to be met, failure to thrive<br>• Lack of food may be linked with neglect<br>• Refusing medical care endangering life/development<br>• Seriously obese<br>• Dental decay and no access to treatment<br>• Persistent and high-risk substance misuse<br>• Dangerous sexual activity and/or early teenage pregnancy<br>• Child sexual exploitation (CSE)<br>• Suspected imminent risk of FGM (female genital mutilation)<br>• Sexual abuse<br>• Self-harming<br>• Non-accidental injury<br>• Acute mental health problems e.g. severe depression, threat of suicide, psychotic episode<br>• Physical harming disability requiring constant supervision<br>**Emotional development**<br>• Puts self or others in danger e.g. missing from home<br>• Severe emotional/ behavioural challenges<br>• Unable to connect cause and effect of own actions<br>• Unable to display empathy<br>• Suffers from periods of severe depression<br>• Self-harming or suicide attempts<br>**Behavioural developments**<br>• Unable to determine boundaries, roles and responsibilities appropriately<br>• Cannot maintain peer relationships e.g. is aggressive, bully, bullied<br>• Regularly involved in anti-social/criminal activities<br>• Repeated missing persons episodes<br>• Prosecution of offences resulting in court orders, custodial sentences, ASBOs<br>• Non-compliant or poor response to support<br>• Professional concerns – but difficulty accessing child/young person<br>• Unaccompanied refuge/asylum seeker<br>• Privately fostered<br>• Abusing other children<br>• Young Sex Offenders<br>• Serious or persistent offending behaviour likely to lead to custody/remand in secure unit/prison<br>• Subject to Family Support or Child Protection Plan | **Identity and self-esteem**<br>• Child/young person experiences persistent discrimination; internalised and reflected in poor self-image<br>• Failed Education Supervision Order – 3 prosecutions for non-attendance; family refusing to engage<br>• Socially isolated and lacking appropriate role models<br>• Alienates self from others<br>• Bullying<br>• Lack of confidence is incapacitating<br>• Victim of crime, may fear persecution by others<br>• Poor and inappropriate self-presentation<br>• Child/young person likely to put self at risk<br>• Child sexual exploitation (CSE)<br>• Evident mental health needs<br>**Family and social relationships**<br>• Repeated missing persons episodes<br>• Relationships with family experienced as negative ('low warmth, high criticism')<br>• Rejection by a parent/carer; family no longer want to care for – or have abandoned – child/young person<br>• Periods accommodated by Council<br>• Family breakdown related to child's behavioural difficulties<br>• Subject to physical, emotional or sexual abuse or neglect<br>• Child Exploitation (CE)<br>• Suspected imminent risk of FGM (female genital mutilation)<br>• Child is main carer for family member<br>**Self-care skills and independence**<br>• Severe disability – child/young person relies totally on other people to meet care needs<br>• Child neglects to use self-care skills due to alternative priorities, e.g. substance misuse<br>**Learning**<br>• Puts self or others at risk through behaviour<br>• No, or acrimonious, home-nursery or school link<br>• Young child with few, if any, achievements<br>• No school placement<br>• Child/young person is out of school<br>• Has no access to leisure activities<br>• Multiple fixed term exclusions or risk of permanent exclusion<br>• Consistently poor or no educational attainment progress | **Basic care, safety and protection**<br>• Parents/carers unable to provide 'good enough' parenting that is adequate and safe.<br>• Parent/carer's mental health or substance misuse significantly affect care of child<br>• Parents/carers unable to care for previous children<br>• Instability and violence in the home continually<br>• Parents/carers involved in crime<br>• Parents unable to restrict access to home by dangerous adults<br>• Parents/carers own needs mean they are unable to keep child/young person safe<br>• Chronic and serious domestic violence involving child/young person<br>• Unexplained injuries<br>• Parents not engaging with professionals<br>• Allegation or reasonable suspicion of serious injury, abuse or neglect.<br>• Unable to manage severe challenging behaviour without support –high risk of family breakdown<br>• Suspected/evidence of fabricated or induced illness: Unable to meet child/young person's physical or emotional needs<br>• Disclosure from parent of abuse to child/young person<br>• Escalation or serious domestic violence<br>**Emotional warmth and stability**<br>• Parents/carers inconsistent, highly critical, rejecting or apathetic towards child<br>• Family life chaotic<br>• Child/young person beyond parental/carers' control<br>• Parent's own emotional experiences impacting on their ability to meet child/young person's needs<br>• Child has no-one to care for him/her<br>• Child/young person threatened with rejection from home<br>• Requesting young child be accommodated<br>**Guidance, boundaries and stimulation**<br>• No effective boundaries set by parents/carers<br>• Multiple carers with no consistency<br>• Child regularly behaves in an anti-social way in the neighbourhood<br>• No constructive leisure<br>• Exposure to online forums evident to resulting in harm | **Family functioning and well-being**<br>• Significant parental/carer discord and persistent domestic violence<br>• Family characterised by conflict and serious chronic relationship difficulties<br>• History of rejection<br>• Poor relationships between siblings and wider family<br>• No effective support from extended family<br>• Destructive/unhelpful involvement from extended family<br>• Child/young person has been identified as a child/young person in need, but parents/carers have refused support<br>• Family involved in criminal activity; parent or sibling has received custodial sentence<br>• Individual posing a risk to children in, or known to household<br>• Unsafe home environment<br>• Family home used for drug taking, prostitution, illegal activities<br>• Family have physical or mental health needs that impact on parenting capacity<br>• Parent / care has Learning needs that impact on parenting capacity<br>**Housing, work and income**<br>• Homeless – or imminent<br>• Housing dangerous or seriously threatening to health<br>• Physical accommodation places child in danger<br>• Chronic unemployment that has severely affected parents' own identities<br>• Family unable to gain employment due to significant lack of basic skills or long-term substance misuse<br>• Extreme poverty/debt impacting on ability to care for child<br>• No expectation that young person will work<br>**Social and community including education**<br>• Family chronically socially excluded<br>• No supportive network<br>• Community are hostile to family<br>• Child frequently goes missing and fails to account for their locations or discloses situations indicating risk of CE<br>• Child trafficked to UK for sexual exploitation<br>• Currently being discriminated and or on going and increasing incidents of discrimination |

# Appendix C Threshold Document – Levels of need when working with children and families in Milton Keynes

## Level 1

**UNIVERSAL NEEDS: Children who make good overall progress in most areas of development and receive appropriate universal services, such as health care and education. They may also use leisure and play facilities or voluntary sector services.**

### DEVELOPMENT OF THE BABY OR CHILD

**Health**
- Physically well
- Nutritious diet
- Adequate hygiene and dress
- Developmental and health checks and immunisations up to date
- Developmental milestones & motor skills appropriate
- Good height/weight
- Sexual activity appropriate for age
- Good mental health

**Emotional development**
- Good quality early attachments
- Able to adapt to change
- Able to understand others' feelings

**Behavioural developments**
- Takes responsibility for own behaviour
- Responds appropriately to boundaries and constructive guidance
- Plays positively

**Identity and self-esteem**
- Positive sense of self and abilities
- Sense of belonging and acceptance by others
- Confident in social situations
- Can discriminate between safe and unsafe contacts

**Family and social relationships**
- Stable and affectionate relationships with carers
- Good relationships with siblings and peers
- Developing independent and self care skills

**Learning**
- Access to books and toys
- Acquires a wide range of skills and interests
- Enjoys and participates in learning activities
- Has experiences of success and achievement
- Sound links between home and school
- Planning for career and adult life

### PARENTS & CARERS

**Basic care, safety and protection**
- Provide for child's physical needs, *eg* food, drink, appropriate clothing, medical and dental care
- Protection from danger or significant harm, in the home and elsewhere

**Emotional warmth and stability**
- Shows warm regard, praise and encouragement
- Ensures stable relationships
- Provides consistency of emotional warmth over time

**Guidance, boundaries and stimulation**
- Encourages learning and development through interaction and play
- Enables child/young person to experience success
- Ensure the child can develop a sense of right and wrong
- Child/young person accesses leisure facilities as appropriate to age and interests

### FAMILY & ENVIRONMENT ELEMENTS

**Family functioning and well-being**
- Good relationships within family, including when parents are separated
- Sense of wider family, friends and community, networks

**Housing, work and income**
- Accommodation has basic amenities and appropriate facilities, and can meet family needs
- Parents/carers able to manage the working or unemployment arrangements
- Managing budget to meet individual needs

**Social and community including education**
- Family feels part of the community
- Good social and friendship networks exists
- Community is generally supportive of families with children/young people

## Level 2

**ADDITIONAL NEEDS: Children whose needs require some extra support. A single universal or targeted service or two services are likely to be involved; there is not a 'team around the family' and a Lead Professional is not required.**

### DEVELOPMENT OF THE BABY OR CHILD

**Health**
- Inadequate diet, *eg* no breakfast
- Missing immunisations/checks
- Child is susceptible to persistent minor health problems or accidents
- Slow in reaching developmental milestones
- Minor concerns re diet, hygiene, clothing
- Weight not increasing at rate expected, or obesity
- Dental care not sufficient
- Vulnerable to emotional problems, perhaps in response to life events such as parental separation *eg* child seems unduly anxious, angry or defiant
- Early sexual activity or awareness
- Experimenting with tobacco, alcohol or illegal drugs
- Frequent accidents or A & E attendance or admissions to hospital

**Emotional development**
- Some difficulties with family relationships
- Some difficulties with peer group relationships and with adults, *eg* 'clingy', anxious or withdrawn
- Some evidence of inappropriate responses and actions
- Starting to show difficulties expressing empathy
- Limited engagement in play with others
- Victim of abuse, but risk now managed

**Behavioural development**
- Not always able to understand how own actions impact on others
- Finds accepting responsibility for own actions difficult
- Responds inappropriately to boundaries and constructive guidance
- Finds positive interaction difficult with peers in unstructured contexts

**Identity and self-esteem**
- Some insecurities around identity expressed *eg* low self-esteem
- May experience bullying around difference
- May be perpetrating bullying behaviour
- Child can be over friendly or withdrawn with strangers
- Child/young person provocative in behaviour/appearance *eg* inappropriately dressed for school

**Family and social relationships**
- Lack of positive role models
- Child has some difficulties sustaining relationships
- Unresolved issues arising from parents' separation, step parenting or bereavement

**Self-care skills and independence**
- Disability limits amount of self-care possible
- Not always adequate self-care, *eg* poor hygiene
- Child slow to develop age-appropriate self-care skills

**Learning**
- Have some identified learning needs that result in a school level response
- Language and communication difficulties
- Poor punctuality/pattern of regular school absences
- Not always engaged in play/learning, *eg* poor concentration
- Not thought to be reaching his/her education potential
- Reduced access to books/toys
- Home-School links not well established
- Limited evidence of progression planning
- At risk of making poor decision about progression
- Limited participation of young person in education, employment or training

### PARENTS AND CARERS

**Basic care, safety and protection**
- Basic care is not provided consistently
- Haphazard use of safety equipment *eg* fireguards
- Parent/carer engagement with services is poor
- Parent/carer requires advice on parenting issues
- Some concerns around child's physical needs being met
- Young, inexperienced parents
- Teenage pregnancy
- Inappropriate child care arrangements and/or too many carers
- Some exposure to dangerous situations in the home or community
- Unnecessary or frequent visits to doctor/casualty
- Parent/carer stresses starting to affect ability to ensure child's safety

**Emotional warmth and stability**
- Inconsistent responses to child/young person by parent/carer
- Parents struggling to have their own emotional needs met
- Child/young person not able to develop other positive relationships
- Child/young person's key relationships with family members not kept up
- Starting to show difficulties with attachments

**Guidance, boundaries and stimulation**
- Parent/carer offers inconsistent boundaries
- Lack of routine in the home
- Child/young person spends considerable time alone *eg* watching television
- Child/young person is not often exposed to new experiences; has limited access to leisure activities
- Child/young person can behave in an anti-social way in the neighbourhood, *eg* petty crime

### FAMILY AND ENVIRONMENT ELEMENTS

**Family functioning and well-being**
- Parents/carers have some conflicts or difficulties that can involve the child/young person
- A child or young person has experienced loss of significant adult, *eg* through bereavement or separation
- Parent/carer has physical/mental health difficulties
- A child/young person is taking on a caring role in relation to their parent/carer, or is looking after younger siblings
- Privately fostered
- Adopted
- Limited friends and family support
- Child looked after by many different adults

**Housing, work and income**
- Poor housing
- Some problems over basic facilities
- Family seeking asylum or refugees
- Periods of unemployment of parent/carer
- Parents/carers have limited formal education
- Low income
- Financial/debt problems
- No recourse to public funds

**Social and community including education**
- Family new to the area or with limited contact with community members
- Some social exclusion or conflict experiences; low tolerance
- Community characterised by negativity towards children/young people
- Difficulty accessing community facilities

## Level 3

**CONSIDERABLE: Children whose needs are more complex. This refers to the range, depth or significance of needs. More than one service often needed, with a 'Team around the Family' and Lead Professional. Children and Families Practices often involved.**

### DEVELOPMENT OF THE BABY OR CHILD

**Health**
- Concerns re diet, hygiene, clothing
- Child has some chronic/recurring health problems, not treated, or badly managed
- Missing routine and non-routine health appointments
- Weight gain becoming a cause of concern – below 3rd centile
- Limited or restricted diet, *eg* no breakfast, no lunch money
- Concerns about developmental progress, *eg* overweight/ underweight, bedwetting/soiling
- Developmental milestones are unlikely to be met
- Dental decay
- Smokes/other regular substance misuse
- 'Unsafe' sexual activity
- Learning significantly affected by health problems
- Significant speech language difficulties/delay or disordered development
- Child has significant disability
- Mental health issues emerging *eg* conduct disorder, ADHD, anxiety, depression, eating disorder, self-harming
- Frequent accidents
- Clothing is regularly unwashed or unsuitable
- Presentation (including hygiene) significantly impacts on all relationships
- Child lacks confidence or is watchful or wary of carers/people
- May be aggressive in behaviour/appearance

**Family and social relationships**
- Relationships with carers characterised by inconsistencies
- Child has lack of positive role models
- Child appears to have undifferentiated attachments
- Misses school or leisure activities
- Involved in conflicts with peers/siblings
- Lack of friends/social network
- May have previously had periods of LA accommodation
- Concerns of absences from home without parental consent
- Emerging behaviours which could suggest Child Exploitation
- Emerging behaviours which could suggest a risk of radicalisation

**Self-care skills and independence**
- Disability prevents self-care in a significant range of tasks
- Child takes little or no responsibility for self-care tasks compared with peers
- Child lacks a sense of safety and often puts him/herself in danger
- Child is main carer for family member

**Learning**
- Identified learning needs that are being addressed at school level.
- Regular underachievement causing concern at school
- Poor nursery/school attendance and punctuality
- Poor home-nursery school link
- Some fixed-term exclusions
- Very limited interests/skills displayed
- Not in education (under 16)
- Not in education, employment, or training post-16

**Emotional development**
- Poor peer relationships difficulty sustaining relationships
- Child/young person finds it difficult to cope with or express emotions *eg* anger, frustration, sadness, grief
- Sexualised behaviour
- Significant difficulties with managing change
- Child appears regularly anxious, stressed or phobic
- Caring responsibilities affecting development

**Behavioural development**
- Does not accept responsibility for own actions; finds it hard to understand how own actions impact on others or learn from consequences
- Disruptive/challenging behaviour at school, home or in the neighbourhood
- Starting to commit offences/re-offend
- Interacts negatively with peers in learning and play contexts
- Child/young person is withdrawn, isolated/unwilling to engage
- Concerns of absences from home without parental consent
- Emerging behaviours which could suggest child exploitation*
- Indecent images **child-to-child**

**Identity and self-esteem**
- Child subject to persistent discrimination, *eg* racial, sexual or due to disabilities
- Demonstrates significantly low self-esteem/confidence in a range of situations
- Victim of crime or bullying
- Signs of deteriorating emotional well-being/mental health
- May not discriminate effectively with strangers

### PARENTS AND CARERS

**Basic care safety and protection**
- Parent/carer is struggling to provide adequate care
- Parents have found it difficult to care for previous child/young person
- Inappropriate care arrangements
- Instability and domestic violence in the home
- Parent's mental health problems or substance misuse significantly affect care of child/young person
- Non-compliance of parents/carers with services
- Practitioners have serious concerns
- Experiencing unsafe situations
- Child/young person caring for siblings/parent
- Child/young person perceived to be a problem by parents
- Child/young person may be subject to neglect
- Child/young person previously looked after by Local Authority

**Emotional warmth and stability**
- Child receives erratic or inconsistent care
- Child has episodes of poor quality care
- Parental/carer instability/emotional needs affects capacity to nurture
- Some relationship difficulties
- Child has no other positive relationships
- Child has multiple carers; may have no significant relationship to any of them
- Child has been 'Looked After' by the Local Authority

**Guidance, boundaries and stimulation**
- Erratic or inadequate guidance provided
- Parents struggle/refuse to set effective boundaries *eg* too loose/tight/physical chastisement
- Child/young person behaves in anti-social way in the neighbourhood
- Parent/carer does not offer a good role model, *eg* by behaving in an anti-social way
- Child not receiving positive stimulation, with lack of new experiences or activities
- Child/young person under undue parental pressure to achieve/aspire

### FAMILY AND ENVIRONMENT ELEMENTS

**Family functioning and well-being**
- Incidents of domestic violence between parents/carers
- Acrimonious divorce/separation
- Family has serious physical and mental health difficulties
- Family has poor relationship with extended family or little communication
- Family is socially isolated

**Housing, work and income**
- Poor state of repair, temporary or overcrowded, or unsafe
- Living in interim accommodation
- Experiencing frequent moves
- Intentionally homeless
- Parents/carers experience stress due to unemployment or 'overworking', may be impacting on other aspects of family life *eg* marital relationship
- Parents/carers find it difficult to obtain employment due to poor basic skills
- Serious debts/poverty impact on ability to have basic needs met
- Low income plus adverse additional factors *eg* up to borrowing limit of Social Care Fund
- Rent arrears put family at risk of eviction or proceedings initiated

**Social and community including education**
- Parents/carers socially excluded/isolated
- Lack of a support network
- Low community support for families
- Acrimonious relationships within community
- Poor quality access to universal and targeted services
- Concerns expressed by others

## Level 4

**SPECIALIST NEEDS: Children with complex and enduring needs which cross many domains. More than one service needed, with a 'Team around the Family' and Lead Professional, commonly in a statutory role. At times statutory intervention may be required.**

### DEVELOPMENT OF THE BABY OR CHILD

**Health**
- Child/young person has severe/chronic health problems
- Child/young person's weight and height both under the 0.4th centile
- Other developmental milestones unlikely to be met; failure to thrive
- Lack of food may be linked with neglect
- Refusing medical care endangering life/development
- Seriously obese
- Dental decay and no access to treatment
- Persistent and high risk substance misuse
- Dangerous sexual activity and/or early teenage pregnancy
- *Child sexual/criminal exploitation
- **Suspected imminent risk of FGM (female genital mutilation)
- Sexual abuse
- Self-harming
- Non-accidental injury
- Acute mental health problems *eg* severe depression, threat of suicide, psychotic episode
- Physical/learning disability requiring constant supervision

**Identity and self-esteem**
- Child/young person experiences persistent discrimination; internalised and reflected in poor self-image
- Failed Education Supervision Order – three prosecutions for non-attendance: family refusing to engage
- Socially isolated and lacking appropriate role models
- Alienates self from others
- Bullying
- Lack of confidence is incapacitating
- Victim of crime; may fear persecution by others
- Poor and inappropriate self-presentation
- Child/young person likely to put self at risk
- *Child sexual/criminal exploitation
- Evident mental health needs

**Family and social relationships**
- Repeated missing persons episodes
- Relationships with family experienced as negative ('low warmth, high criticism')
- Disclosure of abuse from child/young person
- Evidence of significant harm or neglect
- Disclosure of abuse/physical injury caused by a professional

**Emotional development**
- Puts self or others in danger *eg* missing from home
- Severe emotional/ behavioural challenges
- Unable to connect cause and effect of own actions
- Unable to display empathy
- Suffers from periods of severe depression
- Self-harming or suicide attempts

**Behavioural development**
- Unable to determine boundaries, roles and responsibilities appropriately
- Cannot maintain peer relationships *eg* is aggressive, bully, bullied
- Regularly involved in anti-social/criminal activities
- Repeated missing persons episodes
- Prosecution of offences resulting in court orders, custodial sentences, ASBOs
- Non-compliant or poor response to support

### PARENTS AND CARERS

**Basic care, safety and protection**
- Parents/carers unable to provide 'good enough' parenting that is adequate and safe;
- Parent/carer's mental health or substance misuse significantly affect care of child
- Parents/carers unable to care for previous children
- Instability and violence in the home continually
- Parents/carers involved in crime
- Parents unable to restrict access to home by dangerous adults
- Parents/carers own needs mean they are unable to keep child/young person safe
- Chronic and serious domestic violence involving child/young person
- Unexplained injuries
- Parents not engaging with professionals
- Allegation or reasonable suspicion of serious injury, abuse or neglect.
- Unable to manage severe challenging behaviour without support –high risk of family breakdown
- Suspected/evidence of fabricated or induced illness
- Unable to meet child/young person's physical or emotional needs
- Disclosure from parent of abuse to child/young person
- Rejection by a parent/carer; family no longer want to care for - or have abandoned - child/young person
- Periods accommodated by Council
- Family breakdown related to child's behavioural difficulties
- Subject to physical, emotional or sexual abuse or neglect
- Child sexual/criminal exploitation*
- Suspected imminent risk of FGM (female genital mutilation)**
- Child is main carer for family member
- Suspected imminent risk of Forced Marriage
- Suspected imminent risk of honour-based violence
- Suspected imminent risk of radicalisation

**Self-care skills and independence**
- Severe disability – child/young person relies totally on other people to meet care needs
- Child neglects to use self-care skills due to alternative priorities, e.g. substance misuse

**Learning**
- Puts self or others at risk through behaviour
- Escalating or serious domestic violence

**Emotional warmth and stability**
- Parents/carers inconsistent, highly critical, rejecting or apathetic towards child
- Family life chaotic
- Child/young person beyond parental/carers' control
- Parent's own emotional experiences impacting on their ability to meet child/young person's needs
- Child has no-one to care for him/her
- Child/young person threatened with rejection from home
- Requesting young child be accommodated

**Guidance, boundaries and stimulation**
- No effective boundaries set by parents/carers
- Multiple carers with no consistency
- Child regularly behaves in an anti-social way in the neighbourhood
- No constructive leisure time activities or guided play

### FAMILY AND ENVIRONMENT ELEMENTS

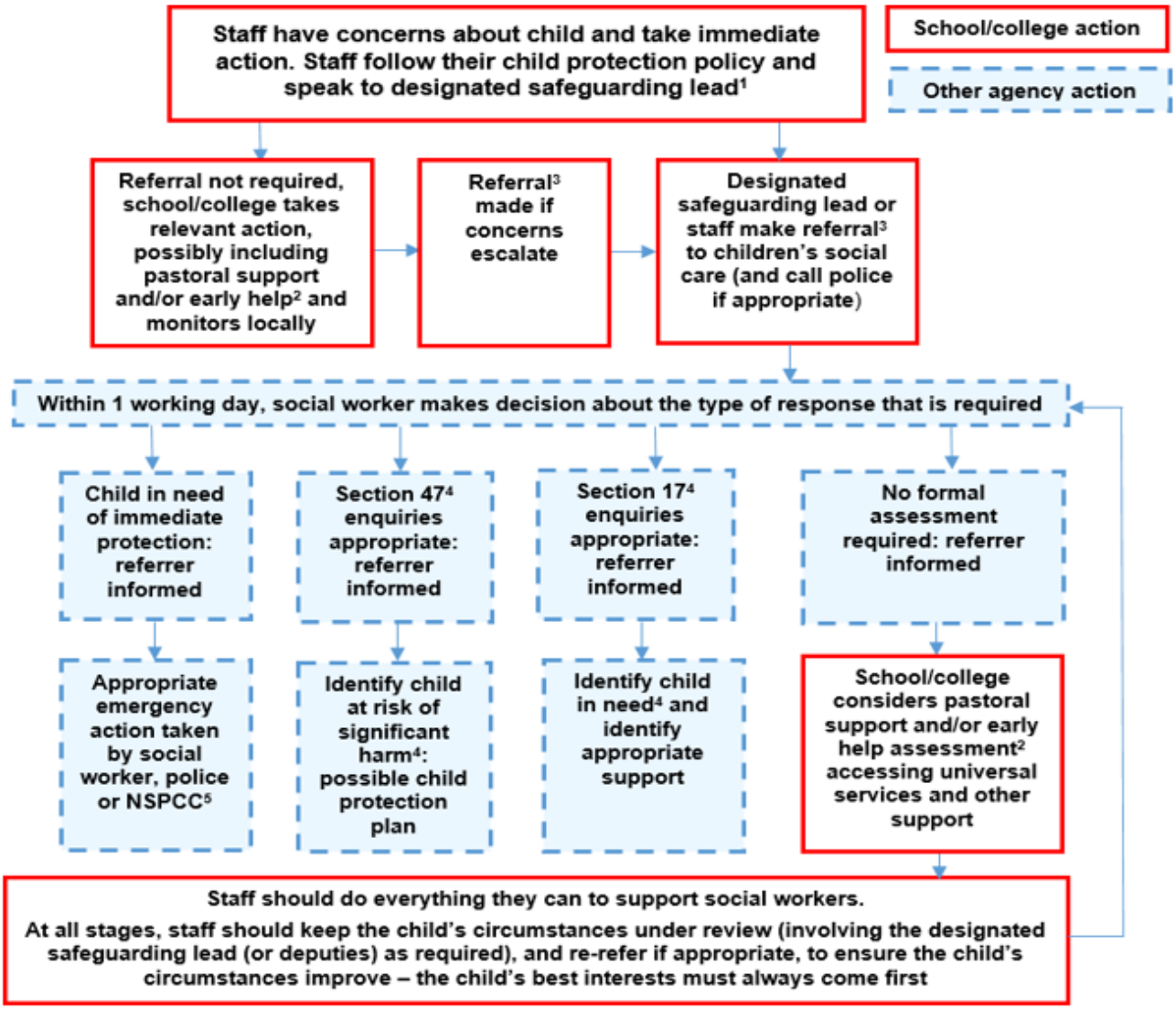
**Family functioning and well-being**
- Significant parental/carer discord and persistent domestic violence
- Family characterised by conflict and serious chronic relationship difficulties
- History of rejection
- Poor relationships between siblings and wider family
- No effective support from extended family
- Destructive/unhelpful involvement from extended family
- Child/young person has been identified as a child/young person in need, but parents/carers have refused support
- Family involved in criminal activity; parent or sibling has received custodial sentence
- Individual posing a risk to children in, or known to household
- Unsafe home environment
- Family home used for drug taking, prostitution, illegal activities

**Housing, work and income**
- Homeless - or imminent
- Housing dangerous or seriously threatening to health
- Physical accommodation places child in danger
- Chronic unemployment that has severely affected parents' own identities
- Family unable to gain employment due to significant lack of basic skills or long-term substance misuse
- Extreme poverty/debt impacting on ability to care for child
- No expectation that young person will work

**Social and community including education**
- Family chronically socially excluded
- No supportive network
- Community are hostile to family

**Appendix D** Concerns flow chart

## Actions where there are concerns about a child (flowchart)




[1] In cases which also involve a concern or a safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors staff member, see Part Four of KCSiE 2022.

[2] Family help/early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated family help/early help, an family help/early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the family help/early help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children. [5] This could include applying for an Emergency Protection Order (EPO).

**Appendix E** Child Protection Records held within a setting

## Child Protection Records [3]held within Settings

This section provides guidance to schools and other educational establishments on record keeping, to enable the designated member of staff with a responsibility for child protection to ensure that all child protection information and concerns are kept in an appropriate and useful manner.

Deficiencies in record keeping have been identified by several child death enquiries as a problem area that requires attention from all agencies.

KCSiE highlights the benefits of a separate file for each child and structuring your recording with a clear and comprehensive summary of the concern, details of follow-up and resolution then any actions taken and the outcome for the child.

Good record keeping is essential in safeguarding the welfare of children and young people, particularly with regards to children/young people who are subject to child protection plans or who are identified as vulnerable. For this reason, it is advisable to carry out a regular audit of all child protection information kept in school, to ensure that procedures are being followed correctly.

1**. What kind of information should be recorded?**

Any member of staff who has a concern about a child should record their concern on CPOMS.

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

- Factual
- Using a child's own words where possible
- A record of what you saw and heard

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

If a referral is made to the Assessment Team or Thames Valley Police, Child Abuse Investigation Unit a written record of all concerns held should be sent and a copy of the referral should be kept by the school.

Nagging Doubts about a Child's Safety and Welfare

Sometimes, things which seem to be insignificant or trivial at the time turn out to be vital pieces of information later.

A record should be made of any information, including hearsay and 'nagging doubts', which give you cause for concern about a child. Much of this information may not appear to be very significant on its own, but it could contribute to a 'jigsaw' picture of abuse that should not be ignored. Remember no concern is too small.

If there has been no specific incident or information, still make an entry. Try to identify what is really making you feel worried.

It is crucial that actions and outcomes are recorded, including any consultation that has been carried out with any other professionals.

[3] Where this policy refers to 'records' these may be securely stored paper records or through a password-protected software package designed for recording safeguarding issues.

**2. How should notes and reports be made?**

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

All notes and reports must contain the following:

- Date of the incident
- Date and time of the record being made
- Name and date of birth of the child(ren) concerned
- A factual account of what happened, and the location where the incident took place (keeping it in the child's words)
- A note of any other people involved e.g. as witnesses
- Questions that the adult asked (remember do not ask leading questions)
- Action taken, and any future plans e.g. monitor and review
- Any other agencies informed:
    - Names,
    - Dates,
    - Times of anyone spoken to.
- Printed name of the person making the record
- Job title of the person making the record

The source of the information should be identified e.g. 'Mrs Bell, a midday supervisor, informed me that…' Or 'I saw John in the playground at break time….'

Information should be factual or based on fact. Record what you saw, heard etc. and try not to be vague or woolly (e.g. 'Jenny was crying and rocking' rather than 'Jenny was upset').

Opinion is acceptable provided that you can give some justification for holding it (e.g. 'Sam ran and hid under the table when his mother arrived to take him home and clung to me when I tried to get him out. He appeared to be frightened.').

Make a note of what you have done with the information (e.g. 'I consulted the Headteacher, Mr Wilson, and he said he would…').

Try to avoid specialist jargon (e.g. 'he is SEN') which someone from another agency would not necessarily understand, right the information in full (Special Educational Needs).

**3. Records and Reports for Child Protection Conferences**

Reports prepared for Child Protection Conferences should focus on the child's:

- Educational Progress and Achievements
- Attendance
- Behaviour
- Participation
- Relationships with other children and young people
- Appearance, (where appropriate)
- Interaction with other children and adults

If relevant, reports should include what is known about the child's relationships with his or her family and the family structure. Reports should be objective and based on evidence. They should distinguish between fact, observation, allegation and opinion.

Settings should:

- Make reports available to the child's parents prior to the Child Protection Conference unless to do so would place the child at risk of significant harm
- Provide written reports to the Child Protection Conference

- Arrange for an appropriate person from the school to attend the Child Protection Conference

**4. Where should child protection information be kept?**

CPOMS should contain all reports, notes and correspondence referring to a child.

A note or symbol (e.g. a blue star) should be placed on the cover of the school file for the child, indicating that there is a child protection file relating to the child. All staff who may need to consult the child's school file should be made aware what the symbol means, and who to consult if they see it.

**5. Who should have access to child protection information?**

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

School staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

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

Child protection information should not ordinarily be shared with agencies other than these statutory agencies e.g. information should not be released to solicitors etc. Where such a request is made, it is best to seek further advice and guidance from the relevant LADO team (see section 11).

The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act. For manual records, the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, the school may be required to provide its child protection records.

**6. What should happen to the information when a child leaves the school/ How long should information be kept?**

If the child is moving to another school, the complete child protection file should be sent, under separate cover from the regular school file. It should be marked 'Confidential, Addressee Only', and should go to the Headteacher or Designated Safeguarding Lead of the receiving school. All relevant information including nagging doubts should be shared.

The following form, copies onto school headed paper can be used to prove that a CP file has been passed on and accepted by the new setting:

| | |
|---|---|
| School name: | |
| Child's name: | |
| Date: | Person transferring file: |

| By signing this form, I am confirming that I have received the safeguarding/CP file for the above-named person who is now on role at our setting. | |
|---|---|
| Print name: | Signature: |

**Copies of child protection information should be kept by the final school placement until the child's date of birth + 26 years.**

Information of a child protection nature relating to an allegation against a member of staff, including where the allegation is unfounded, should be kept until the person's normal retirement age or 10 years from the date of the allegation if that's longer.

**7. Sharing Information with other Schools/Agencies**

Conversations between designated personnel at different schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable. Where possible, consent from parents should be sought before a conversation takes place. Any relevant child protection information coming to light should be carefully logged.

If a child protection file has been started for a child who then moves school, the entire contents of the file should be sent to the receiving school/college.

The information should be sent under separate cover to the school file, in a sealed envelope to the Headteacher, marked 'Strictly Confidential'.

If a child moves without a forwarding address for home and school and no contact is received from a new school the county's Missing Pupil Procedures should be followed.

Where a child is removed from roll to be educated at home the school's child protection file should be copied to the Local Authority as soon as possible.

Remember:

- Monitor the child and record observations as factually as possible.
- A direct disclosure from a child or young person should be referred immediately to the appropriate social work team.

## **Appendix F** Safer Recruitment

The principles of Safer Recruitment are an essential foundation to establishing a safe environment for pupils, ensuring those unsuitable to work with children are identified and tackled before they become part of your school community. This includes:

i. Recruitment and selection process;
ii. Pre-appointment vetting checks, regulated activity and recording information;
iii. Prohibitions, directions, sanctions and restrictions;
iv. Other checks that may be necessary for staff, volunteers and others including online checks as part of the recruitment process;
v. The legal reporting duties on employers.

Keeping Children Safe in Education (KCSiE) 2026 notes that any online checks undertaken around a member of staff will only be done so after the member of staff has been informed that these will be taking place.

ODBST provides a safer recruitment policy that schools should follow to ensure they comply fully with the requirements of KCSiE 2026.

All candidates will be sent a link to the ODBST Safeguarding and Child Protection Policy as part of the application pack for all posts at the school.

ODBST policies are clear about what constitutes practices that are “safe” and “unsafe”. Practice and our robust well thought out Code of Conduct offers better protection for all, staff, pupils and families.

Part 3 of Keeping Children Safe in Education 2026 clearly details the responsibilities held by schools for ensuring safer recruitment processes are in place and robustly adhered to.

ODBST expects safer recruitment processes to be followed irrespective of who the candidate might be or what schools think you might know of the candidate. ODBST officers have suitable resources and materials to support ODBST schools through the recruitment process including job descriptions, person specifications and interview/recruitment materials designed to support this aspect.

The ODBST Director of HR will lead Headteachers and Governors through the safeguarding aspects of the recruitment process.

i. Recruitment and selection process

As part of the Trust’s safeguarding culture, Governors ODBST HR will adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges. This includes the processes and working for:

- Adverts
- Application forms
- Shortlisting processes
- Previous employment history
- References
- Interview/selection activities and questioning

Regulations require Local Governing Committees to ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

ii. Pre-appointment vetting checks, regulated activity and recording information

The correct pre-appointment checks will help identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). They should be seen as the part of a wider safeguarding regime which will carry on following appointment. All schools must, with the support of ODBST HR:

- verify a candidate's **identity** by checking the name on their birth certificate;
- obtain an enhanced **DBS check** (including children's barred list information, for those who will be engaging in regulated activity with children);
- obtain a separate children's **barred list check** if an individual will start work in regulated activity with children before the DBS certificate is available;
- verify the candidate's **mental and physical fitness** to carry out their work responsibilities.
- verify the person's **right to work in the UK**, including EU nationals;
- check if the person has lived or worked outside the UK;
- verify professional **qualifications;**
- check that a candidate taking up a management position is not subject to a **section 128** direction;
- any applicant to be employed to carry out teaching work is not subject to a **prohibition order** issued by the Secretary of State;
- any individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not **disqualified** from working in these settings.

The Single Central Record (SCR) of a school should provide an auditable means to evidence the principles of safer recruitment have been adhered to i.e. evidence of identity, DBS and Border Agency checks carried out, take-up of references, photographic ID, checks carried out on the Prohibited Orders list, etc. Schools should work with ODBST HR.

iii. Prohibitions, directions, sanctions and restrictions

The ODBST HR Service will support checks for the following:

- Secretary of State teacher prohibition, and interim prohibition orders
- Historic General Teaching Council for England (GTCE) sanctions and restrictions
- Secretary of State section 128 direction
- TRA, prohibitions, directions, sanctions and restrictions
- European Economic Area (EEA) regulating authority teacher sanctions or restrictions
- Childcare disqualification

iv. Other checks that may be necessary for staff, volunteers and others

- Individuals who have lived or worked outside the UK.
- Agency and third-party staff (supply staff)
  Schools must obtain written notification from any agency, or third-party organisation they use that the organisation has carried out the checks (in respect of the enhanced DBS certificate, written notification that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at the school or college that the school or college would otherwise perform.
- Trainee/student teachers
  Where applicants for initial teacher training are salaried by the school or college, the school or college must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) must be obtained.

  Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools and colleges should obtain written confirmation from the provider that it has carried out all pre-appointment checks.
- Volunteers
  Any volunteer undertaking regulated activity must have an enhanced DBS check with children's barred list information regardless of supervision arrangements.

Volunteers should not, on an unsupervised basis, teach or look after children regularly or provide personal care on a one-off basis in schools and colleges, will be in regulated activity.

Existing volunteers in regulated activity and who already have a DBS check (which includes barred list information) should now also have a children's barred list check. However, schools and colleges may conduct a repeat DBS check (which should include barred list information) on any such volunteer should they have concerns.

The school should undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so they should consider:

- the nature of the work with children;
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- whether the role is eligible for an enhanced DBS check;

Details of the risk assessment should be recorded.

- Contractors
  Where schools use contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school or college. They should ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

  For contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.

- Trustees
  ODBST must require enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees.
  The ODBST SCR for Trustees and centrally employed staff must be available for inspection by those statutorily allowed access to this record and should be a part of the school's SCR.

v. The legal reporting duties on employers

Local Governing Committees and Trustees should ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. They should consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care for:

- Existing staff
- Duty to refer to the Disclosure and Barring Service
- Duty to consider referral to the Teaching Regulation Agency
- Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

**Appendix G Briefing for temporary and supply staff (copy onto school headed notepaper)**

## For supply staff and those on short contracts in ODBST schools

| | Name | Photo |
|---|---|---|
| The designated safeguarding lead for child protection in this school | x | |
| Additional Designated Safeguarding Lead(s): | X<br>X | |
| Head Teacher: | x | |
| Designated Teacher for looked after, or previously looked after children | X | |
| Executive Safeguarding Lead | Jan Martin | Mobile: 07551 471094<br>Email: jmartin@odbst.org |
| Safeguarding Trustee | Michael Mill<br>Chairman of the Board | Email: mmill@trustee.odbst.org |

While working in ODBST schools, you have a duty of care towards the children/pupils/pupils here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL), named above. If you have **any** concerns about a child's welfare, you should act on them **immediately.**

This is not an exhaustive list, but you may have become concerned as a result of:

- observing a physical injury, which you think may have been non-accidental
- observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- observing behaviour that leads you to be concerned about a child or young person
- a child or young person telling you that they have been subjected to some form of abuse

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect

- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it and mention anyone else who was present. Then sign it, and give your record to the designated person/child protection officer, who should contact children's social care if appropriate

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in location.

**Remember, if you have a concern, discuss it with the DSL.**

***'It is everyone's business to work together to prevent harm and abuse'***

## Appendix H Using virtual platforms– some basic considerations

While schools are no longer required to routinely provide remote education, there still exist the potential for 'remote/online learning' to be initiated by senior leaders, Trust Officers or nationally by the DfE, to suit specific local or national situations. These situations may apply to specific class groups, year or phase groups or individuals potentially impacted by the situation which makes daily attendance difficult.

The ODBST has a Remote Learning Policy which sets out the provision and expectations for pupils who are learning remotely and/or use ODBST devices at home.

Support is available to help schools to help keep pupils and staff safe whilst learning remotely, safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC also provide helpful advice - Undertaking remote teaching safely