DEVONPORT HIGH SCHOOL FOR GIRLS

SAFEGUARDING AND CHILD PROTECTION POLICY

Named person: Ruth Morgan

Category: Statutory

Review: Annually or when there are significant changes

Date to be reviewed: Summer 2024

This policy has been reviewed with regard to the work/life balance of staff.

Adopted by the Trustees Committee on: 10/07/2023
(Minor update 30/01/2024)

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1. INTRODUCTION

Safeguarding is everyone's responsibility and all staff should be mindful and alert of the possibility that "it could happen" and concerns be raised in any school. All staff may raise concerns directly with Children's Social Care. (If this option is taken, in the first instance staff must inform the Schools Designated Safeguarding Lead (DSL).)

Safeguarding is defined as protecting children from maltreatment, preventing impairment of health and/or development, ensuring that children grow up in the provision of safe and effective care and taking action to enable all children to have the best outcomes (Working Together to Safeguard Children 2023).

School staff are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.

We will use the guidance from the National Police Chief's Council: When to call the Police, guidance for Schools and Colleges 2020 to inform our decisions in referring current safeguarding concerns to the Police as in line with statutory guidance within Keeping Children Safe in Education 2023.

All school staff will receive safeguarding children training annually, so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. This training is also reinforced bi-annually via HAYS on line training. The DSL will also provide timely updates as appropriate. All staff carry disclosure guidance on the reverse of their Identity Badges.

Temporary staff will be made aware of the safeguarding policies and procedures by the Personnel Assistant as part of their induction.

This Safeguarding and Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school.

Purpose of this Safeguarding and Child Protection Policy
To inform staff, parents/carers and Trustees about the school's responsibilities for safeguarding children. To enable everyone to have a clear understanding of how these responsibilities should be carried out.

Underpinning values:
- Where there is a safeguarding issue, we will work in accordance with the principles outlined in the Plymouth Safeguarding Children Partnership Child Protection procedures.
- A student's welfare is paramount. Each student has a right to be protected from harm and exploitation and to have their welfare safeguarded.
- Each student is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs.
- Students, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances.
- Each student has a right to be consulted about actions taken by others on their behalf. The concerns of students and their families should be listened to and due consideration given to their understanding, wishes and feelings.

- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare.
- Open-mindedness and honesty must guide each stage of assessment and of operational practice. The strengths of individual family members, as well as their needs, should be given due consideration.
- Personal information is usually confidential. It should only be shared with the permission of the individual concerned, or unless the disclosure of confidential personal information is necessary in order to protect a student. In all circumstances, information must be confined to those people directly involved in the professional network of each individual student and on a strictly "need to know" basis.
- Professionals should be aware of the effects of outside intervention upon students, upon family life and the impact and implications of what they say and do.
- Explanations by professionals to students, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms.
- Sound professional practice is based upon positive inter-agency collaboration, evidence based research and effective supervision and evaluation.
- Early help in providing support services is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children (Working Together to Safeguard Children 2023).

Mission Statement

We endeavour to:
1. maintain an environment where our students feel secure, are encouraged to talk, and are listened to when they have a worry or concern.
2. maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and well being of a student or the behaviour of a colleague.
3. ensure students know that there are adults in the school whom they can approach if they are worried.
4. ensure that students who have been abused will be supported in line with a child protection plan, where deemed necessary.
5. include opportunities in the PSHEE curriculum for students to develop the skills they need to recognise and stay safe from abuse.
6. safeguard and promote the welfare of children by:
   - 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
   - taking action to enable all children to have the best outcomes

Implementation, Monitoring and Review of the Child Protection Policy

The policy will be reviewed annually by the Trustees. It will be implemented through the school's induction and training programme, and as part of day to day practice.

Compliance with the policy will be monitored by the DSL.

2.   STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- Keeping Children Safe in Education 2023
- Ofsted Review of Sexual Abuse in Schools and Colleges 2021
- National Police Chief's Council: When to call the Police; Guidance for Schools and Colleges 2020
- The DfE advise "Sexual Violence and Sexual Harassment between children in schools and colleges" 2018
- Working Together to Safeguard Children 2023
- The DfE guidance 'Child Sexual Exploitation' Feb 2017
- Sexting in Schools and Colleges: Responding to incidents and Safeguarding Young People 2016
- The Counter-Terrorism and Security Act 2015
- Protection of Freedoms Act 2012
- Equalities Act 2010
- The Education Regulations 2005
- The Children Act 2004
- Education Act 2002 (section 175)
- The Children Act 1989
- Plymouth Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures

Working Together to Safeguard Children (HM Government 2018) requires all schools to follow the procedures for protecting children from abuse which are established by their Safeguarding Partnership (Plymouth safeguarding Children Partnership: Plymouth City Council, NHS Devon Integrated Care Board and Devon and Cornwall Police). Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff, supply staff or volunteer is accused of, or suspected of abuse.

Keeping Children Safe in Education (DfE 2023) states:

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.

School staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children 2023. We will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

3.   THE DESIGNATED SAFEGUARDING LEAD (DSL)

The Designated Safeguarding Lead for Child Protection in this school is:

Mrs R Morgan – Assistant Head Teacher

The Deputy Designated Safeguarding Lead for Child Protection in this school is:

Dr D Parry. – Senior Head of House

The DSL and/or deputy DSL will be available at all times in school hours to discuss safeguarding concerns. In the exceptional circumstances where this is not the case, the office will have an emergency contact number so that a telephone conversation can be facilitated. Out of hours cover for the DSL Safeguarding conversations are agreed as part of trip and visit risk assessment processes.

Role of the designated safeguarding lead

Working with others by:
- acting as a source of support, advice and expertise for all staff.
- acting as a point of contact with the Plymouth safeguarding partnership.
- liaising with the Head Teacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaising with the 'case manager' and the local authority designated officer (LADO) for child protection concerns in cases which concern a staff member.
- liaising with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and SENCO) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- coordinating a response where safeguarding concerns are linked to mental health.
- promoting supportive engagement with parents / carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- working with the Head Teacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.
- ensuring that we know who our cohort of students who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort.
- supporting teaching staff to provide additional academic support or reasonable adjustments to help students who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on their educational outcomes.

Information sharing and managing the child protection file
The DSL is responsible for ensuring that child protection files are kept up to date. Information will be kept confidential and stored securely via CPOMS and historic records in a separate child protection file for each child. Records will include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.

- CPOMS provides levels of access appropriate to protect confidentiality and a "need to know" approach to information sharing.
- where a student leaves the school the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The file/CPOMS record will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt will be obtained.
- On receipt of any new safeguarding files or information from other institutions the DSL will ensure key staff such as the SENCO are aware as required.
- In addition to the child protection file/CPOMS record, the DSL will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard the student and to help the child thrive in the school or college.

Raising Awareness by:
- ensuring each member of staff has access to, and understands, the DHSG Safeguarding and child protection policy and procedures.
- ensuring the DHSG Safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing body to do this.
- ensuring the Safeguarding and child protection policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of DHSG in this.
- linking with the Plymouth safeguarding partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that students who have or have had a social worker are experiencing with teachers and SLT.

Training, knowledge and skills
- The DSL and DDSL will undergo training to provide them with the knowledge and skills required to carry out the role.
- This training will be updated at least every two years.
- The DSL and DDSL will undertake Prevent awareness training.

Training will provide the DSL and DDSL with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care. The DSL and DDSL will:

- have an understanding of the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children; understand the lasting impact that adversity and trauma can have, including on

children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions, young carers and LGBT students
- understand the importance of information sharing, both within the school and with the safeguarding partners, other agencies, organisations and practitioners.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses.
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.
- further develop and refresh their knowledge and skills (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff by;
- developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.
- ensuring that staff are supported during the referrals processes.
- supporting staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children by:
- encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them.
- Understanding the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information by;
- understanding the importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (Data Protection Act 2018 and the UK GDPR) and that data protection does not prevent sharing information on safeguarding grounds.
- being able to keep detailed, accurate, secure records of concerns and referrals and understand the purpose of this record-keeping.

4. **THE TRUSTEES**

The Trustees has overall responsibility for ensuring that there are sufficient measures in place to safeguard the students in their establishment.

The nominated Trustee for child protection is Ellen Blakeman.

The nominated Trustee for Looked After Children (LAC) Students is Ellen Blakeman.

In particular, the Governing Body must ensure the following are in place:

- Child protection policy and procedures
- Safe recruitment procedures
- Appointment of a DSL who is a senior member of the school leadership team
- Relevant safeguarding children training for school staff/volunteers is attended
- Safe management of allegations
- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- A member of the Trustees (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Head Teacher
- Safeguarding policies and procedures are reviewed annually

5.   SCHOOL PROCEDURES - STAFF RESPONSIBILITIES

All staff must complete Child Protection training and keep this training up to date. This training is currently supported by completing the HAYS Safeguarding Children online package on joining the school, and then every two years. In addition, the DSL delivers a minimum of one annual refresher and updates as required by new legislation and/or emerging school based safeguarding concerns. All staff are issued with and must be familiar with part 1 of "Keeping Children Safe in Education 2023" (see appendix) and abide by the staff Code of Conduct, these will be issued on an annual basis.

If any member of staff is concerned about a student they must inform the DSL immediately without delay. The member of staff must also provide a written record if requested by the DSL/DDSL via CPOMS regarding the concerns on the same day.

The recording must be a clear, precise, factual, account of the observations/disclosure.

The DSL will decide whether the concerns should be referred to Social Care, however, all staff may refer directly to Social Care themselves (if staff take this option they are to inform the DSL). If it is decided to make a referral to Children's Services: Multi Agency Support Hub (MASH) this will be done with prior discussion to seek consent with the parents/carers, unless to do so would place the student at further risk of harm.

Referrals are made to Plymouth MASH: 01752 668000 or out of hours: 01752 346984. Cornwall MARU 0300 123 116, Devon MASH 0345 155 1071.

Particular attention will be paid to the attendance and development of any student about whom the school has concerns, or who has been identified as being the subject of a child protection plan.

If a student who is/or has been the subject of safeguarding concerns changes school, the DSL will inform the social worker (as applicable) responsible for the case and transfer the appropriate records to the DSL

at the receiving school, in a secure manner, and separate from the student's academic file within 5 working days. A record of this transfer will be kept and evidence of receipt sought.

The DSL will also consider sharing advanced information with the new school to ensure safe transition where there are significant safeguarding issues or support required to enable effective planning.

The DSL is responsible for making the Senior Leadership Team aware of trends in behaviour that may affect student welfare.

6.   OUT OF HOURS SAFEGUARDING SUPPORT

All out of hours school activities will have safeguarding arrangements as part of planning processes and risk assessments. In other out of hours circumstances, where staff have concerns for students they should report this to statutory services such as the Police and Social Services via Gateway and / or the Police. Staff should not respond directly to students out of hours, this gives the impression of 24 hour availability and safety which can lead to higher risk when staff fail to respond.

Emergency Contact Numbers: Police 999 / 1010 (non-emergency)
                                                        MASH 01752 668000 / 01752 346984 (out of hours)

Following any out of hours safeguarding concerns or actions this should be reported as soon as possible to the DSL/DDSL.

7.   CONTEXTUAL SAFEGUARDING

All staff understand that safeguarding incidents and/or behaviours can be associated with factors outside of school (and family home) and will consider the context within which such incidents/behaviours occur in managing the incident/situation. This is known as 'contextual safeguarding' which simply means, assessments of children should consider whether wider environmental factors are present in the child's life that are a threat to their safety and welfare. Examples of extra-familial harms are sexual exploitation, criminal exploitation or youth violence.

This school will ensure that any referral/discussion with students and external agencies will include as much contextual information as possible, to inform their assessment process and decision making, and will utilise the local Adolescent Safety framework.

8.   EARLY HELP ASSESSMENT

DHSG recognises that providing early help is more effective in promoting the welfare of students than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life. Children and families may need support from a wide range of local agencies. Where a student and family would benefit from co-ordinated support from more than one agency (e.g. education, health, housing, (Police), the school will use the Early Help Assessment process to identify what help the student and family require to prevent their needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The school is committed to working in partnership with students, parents/carers and other agencies to:

- identify situations in which students and/or their families would benefit from early help;

- undertake an assessment of the need for early help,
- provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the student's outcomes.

The school will be particularly alert to the potential need for early help for any student who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is a privately fostered child;
- has returned home to their family from care;
- is showing signs of engaging in anti-social or criminal behaviour;
- is in a family whose circumstances present challenges for the student, such as substance abuse, adult mental ill health, domestic abuse;
- is showing early signs of abuse and/or neglect;
- is showing signs of displaying behaviour or views that are considered to be extreme;
- is misusing drugs or alcohol themselves;
- not attending school or are at risk of exclusion from school;
- frequently going missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, exploitation, radicalised;
- not in education, training or employment after the age of 16 (NEET)

The Early Help process can only be effective if it is undertaken with the agreement of the student's parents/carers. The assessment should involve the student and family as well as all the professionals who are working with them. Students may consent to an assessment in their own right, subject to Information Sharing Guidance. We will seek advice in those circumstances. If parents/carers and/or the student do not consent to the Early Help Assessment process being initiated, the school will make a judgement about whether, without help, the needs of the student will escalate. If so, a referral into Children's Social Care may be necessary.

Early Help and SEND Advice – Pre-bookable meeting slot to discuss advice with a Family Support Worker https://outlook.office365.com/owa/calendar/PLymouthcitycouncileducationadviceline@plymouthcc.on microsoft.com/bookings/

Looked After Children, Previously Looked After Children and Care Leavers
The most common reason for children becoming looked after is as a result of abuse and/or neglect. The DSL is also the Designated Teacher for Looked After and Previously Looked After Children and will ensure that appropriate staff have the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the student's contact arrangements with birth parents or those with parental responsibility. These students remain vulnerable to disadvantage and the Designated Teacher will advocate and coordinate support to promote good outcomes. Please consult the stand alone Looked After and Previously Looked After Children Policy for further information.

Children potentially at greater risk of harm: Children who need a social worker
Children may need a social worker due to safeguarding or welfare needs. We recognise that a student's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educational disadvantage in facing barriers to attendance, learning, behaviour and mental health.

When the DSL becomes aware that a student meets this criteria this will inform decisions about safeguarding including responding to unauthorised absence, promoting welfare and advocating for and supporting good academic and personal outcomes.

9. WHEN TO BE CONCERNED ABOUT A CHILD

All staff and volunteers should be aware that the main categories of abuse are:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

However, Safeguarding can involve a range of potential issues such as:
- Bullying, including cyber bullying (by text message, on social networking sites, etc) and prejudice-based bullying
- Racist, disability, and homophobic or transphobic abuse
- Radicalisation and extremist behaviour
- Child sexual exploitation
- Child on Child abuse such as youth produced sexual imagery and sexual harassment
- Substance misuse
- Issues that may be specific to a local area or population, for example gang activity and youth violence
- Particular issues affecting students including domestic abuse, harmful sexual behaviour, female genital mutilation, forced marriage and so called honour based abuse.

Mental Health
Poor mental health can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. A deterioration in mental health can also lead to other safeguarding concerns for example, self harm and suicide ideation or actions.

We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems via the Student Support Team.

Only trained professionals can make a diagnosis of a mental health problem. Staff however, are well placed to observe students 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. We have several Mental Health First Aid trained staff who can support students in school amongst a raft of other supportive options and referral pathways, and early help is essential. Low level concerns should be reported to the relevant Head of House in the first instance. Safeguarding concerns must be reported directly and without delay to the DSL. Robust safety plans are established for students displaying high risk behaviours such as self harm and overdose via multi-agency work (DSL/CAMHS etc.)

10. SELF HARM

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- cutting, scratching, scraping or picking skin
-
- taking an overdose of prescription or non-prescription drugs
- swallowing hazardous materials, substances or objects
- burning or scalding
- hair-pulling
- in some cases, Eating Disorders
- banging or hitting the head or other parts of the body
- scouring or scrubbing the body excessively

Such behaviour will be dealt with as per the School Self-Harm and/or Eating Disorder guidance (see Appendix)

11.   YOUTH PRODUCED SEXUAL IMAGERY

Youth produced sexual imagery is the sending of sexually provocative material (including photos, videos and sexually explicit text) from modern communication devices or applications, such as mobile phones, tablets, email, social media platforms and instant messaging services. Legal implications for students involved in youth produced sexual imagery may breach laws that prohibit the creation, distribution or possession of child pornography regardless of whether all parties involved consent to the images being taken and shared, or whether the images are sent to other minors, even minors of the same age. These activities by a child or of a child under 16 remains a criminal act and since April 2015 "vengeance porn" – the sharing of intimate images without consent has also been made illegal.

Youth produced sexual imagery can also be considered a form of sexual exploitation, sexual harassment and cyberbullying. This is especially the case where images are shared past the intended audience or when accompanied by nasty comments. All staff members are required to notify the DSL immediately upon becoming aware that a Youth produced sexual imagery incident is likely to have occurred.   Please see the appendices for further guidance on how these incidents are managed at DHSG: our guidance is based on UKCCIS document 'Sexting in schools and colleges: Responding to incidents and safeguarding young people and "Sexual Violence and Sexual Harassment between Children in Schools and Colleges". Staff must not view or share suspected images.

12.   CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

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

Some of the following can be indicators of CSE or CCE:
- students who appear with unexplained gifts or new possessions.
- students who associate with other young people involved in exploitation.
- students who suffer from changes in emotional well-being.
- students who misuse drugs and alcohol.
- students who go missing for periods of time or regularly come home late.
- students who regularly miss school or education or do not take part in education.
- students who have older boyfriends or girlfriends.
- students who suffer from sexually transmitted infections or become pregnant.

13.   SERIOUS VIOLENCE / COUNTY LINES

All staff need to be aware of incidents that may indicate that students might be at risk, or be involved with, serious violent crime:

Signs which may indicate criminal exploitation:
- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts /phone calls
- Relationships with controlling /older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault /unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

In addition, the criminal exploitation of children within the illegal drugs trade is geographically widespread and is known as 'county lines'. Criminal gangs exploit children to carry drugs and drug money from urban areas to rural and seaside towns across the country.

Like all forms of abuse county lines can:
· affect any child
· still be exploitation even with the appearance of consent
· involve force/coercion/enticement/violence to gain compliance
· be individuals or groups
· be typified by an imbalance of power

Where there are concerns the DSL must be consulted

Criminal exploitation of children is a Safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals. This may mean a referral into the Police and Social Care.

14.   FEMALE GENITAL MUTILATION (FGM)

"FGM comprises all procedures which involve partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or any other non-therapeutic reasons" (World Health Organisation definition 1995).

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. It is a criminal offence to conduct FGM in this country or to take a British girl or permanent resident of the UK abroad for the purposes of FGM. FGM is a child protection issue and upon suspicion you must follow child protection procedures. It is also mandatory for teaching staff to report cases of FGM to the Police for those who are under 18 (this duty rests with the individual member of teaching staff, however they must also inform the DSL). Under no circumstances should you discuss your suspicions with the student's friends, family or other community members, regardless of whether you trust them or not. There are a range of potential indicators that a student may be at risk of FGM. Indicators that FGM may have taken place are:

- constant need to go to the toilet;
- urine infections;
- spending longer than usual in the toilet/bathroom;
- prolonged absence from school after holiday periods;
- difficulty walking, sitting or standing;
- making excuses or refusal to take part in PE or other physical activities
- family history (sister, mother) having undergone this procedure.

Staff should also be alert to indicators that FGM may soon take place:-
- Parents/carers state that they or a relative will take the student out of the country for a prolonged period
- A student may talk about a long holiday (usually within the school summer holiday) to her country of origin or another country where the practice is prevalent
- A student may confide to a professional that she is to have a 'special procedure' or to attend a special occasion
- A professional hears reference to FGM in conversation, e.g. a student may tell friends about it

Signs that FGM has taken place include:
- Prolonged absence from school with noticeable behaviour changes on the girl's return
- Longer/frequent visits to the toilet particularly after a holiday abroad, or at any time
- Some students may find it difficult to sit still and appear uncomfortable or may complain of pain between their legs
- Some students may speak about 'something somebody did to them, that they are not allowed to talk about'

Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

FGM is practiced in Ghana, Yemen, Togo, Kenya, Mauritania, Senegal, Indonesia, Brazil, Russia, Morocco, Iran, Canada, Thailand, Australia, Saudi Arabia, Somalia, India, Egypt, Sudan, Ethiopia, Mali, and Nigeria. This is not an exhaustive list and if you have any suspicions, please follow our child protection procedures.

DHSG aims to create an 'open environment' where students feel comfortable and safe to discuss the problems they are facing – an environment where FGM can be discussed openly, and support and counselling are provided routinely. Students need to know that they will be listened to and their concerns taken seriously.

15.   HONOUR BASED ABUSE (HBA)

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

Honour Based Abuse (HBA) is defined by the Home Office as:

A collection of practices, which are used to control behaviour within families or other social groups, to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may be a form of domestic and/or sexual violence. It is rooted in domestic violence and is often a conspiracy of family members and associates meaning victims are at risk from their parents and families.

However, staff should not treat any allegations of honour based abuse as a 'domestic issue' and send the student back to the family home. It is not unusual for families to make denials and once aware of professional concern, this may significantly raise the risk of harm to the student.

For this reason, staff should not approach the family or family friends, or attempt to mediate between the child and family, as this will alert them to agency involvement. We will respond to suspicions of a forced marriage or Honour Based Abuse by making a referral to The MASH and the Police Child Abuse Investigation Team.

Further information and advice can be obtained from the Forced Marriage Unit fmu@fco.gov.uk. or 020 7008 1500 and the Honour Based Abuse Helpline 0800 5 999 365.

16.   FORCED MARRIAGE

"A forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure." (((Multi-agency practice guidelines: Handling cases of Forced Marriage 2009.

It is a crime to carry out any conduct where the purpose is to cause a child to marry before 18, even if violence, threats or another form of coercion are not used – this applies to non-binding unofficial "marriages" as well as legal marriages.

This is a safeguarding and child protection issue and staff need to be alert to signs that would indicate a student is as risk:

- absence and persistent absence
- request for extended leave of absence and failure to return from visits to country of origin
- fear about forthcoming school holidays
- surveillance by siblings or cousins at school
- decline in behaviour, engagement, performance or punctuality
- being withdrawn from school by those with parental responsibility
- not allowed to attend extra-curricular activities
- excessive restrictions from home
- sudden announcement of engagement to a stranger
- prevented from going on to further/higher education
- Female Genital Mutilation (FGM)

There are close checks on requests for holidays abroad or requests for leave of absence and close monitoring of attendance and reasons for absence. All concerns regarding the possibility of Forced Marriage will be referred to the Plymouth Multi-Agency Safeguarding Hub (MASH) or the Forced Marriage Unit 0207 0080151 or out of hours 0207 0081500.

17.   DOMESTIC ABUSE

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional.

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. Exposure to 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 the abuse or may have had to leave the family home as a result.

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.

Students who experience domestic abuse in some way, by witnessing it directly or by being aware that it is happening, are likely to be defined as "children in need" under Section 17 of Children Act (1989).

We are an Operation Encompass School and the Key Adult is Mrs R Morgan the DSL**.**

The local Police Protection Unit will notify the Key Adult via an Operation Encompass notification email of any incident relating to Domestic Abuse where a student at the school has been present. The DSL will make decisions to support the student and who to share information with – this may include taking no action.

Operation Encompass helpline service 8.00 am to 1 pm Monday to Friday 0204 513 9990.

All staff and volunteers should be concerned about a student if she/he presents with indicators of possible significant harm – see Appendix 1 for details.

Generally, in an abusive relationship the student may:
- appear frightened of the parent/carers or other household members e.g. siblings or others outside of the home
- act in a way that is inappropriate to her/his age and development (full account needs to be taken of different patterns of development and different ethnic groups)
- display insufficient sense of 'boundaries', lack stranger awareness
- appear wary of adults and display 'frozen watchfulness'

18. CARRYING KNIVES, BLADED ARTICLES OR OTHER OFFENSIVE WEAPONS & GANG CULTURE

Bringing and carrying a knife/offensive weapon onto school premises is a criminal offence and immediate action will be taken which may result in police contact. The guidance on Searching, Screening and Confiscation for Head teachers, Schools and Trustees, January 2018 will be consulted and we will consider and apply relevant disciplinary procedures.

If a member of staff suspects a student of being involved in gang culture, this is a safeguarding concern and will require a discussion with the Designated Safeguarding Lead. Please also consult the appendices for information on bladed articles and self-harm.

19. STUDENT EXCHANGES / HOST FAMILIES

We recognise the need to provide safe provision where host families, homestays and exchange visits abroad are offered. We have a system in place, scrutinise the suitability of adults in families when arranging hosting and exchanges.

We recognise that where we place a student, we are responsible for the safeguarding of that student and will check and review those arrangements to reassure ourselves of those safeguarding arrangements and that of the health, safety & wellbeing of that student. We will obtain written confirmation from the provider that checks have been carried out on individuals working in any such arrangement. These checks including DBS checks where available and appropriate, are managed through risk assessment as part of our trips and visits procedures.

20. EXTREMISM AND RADICALISATION

The Counter-Terrorism and Security Act 2015 places a duty on schools "to have due regard to the need to prevent people from being drawn into terrorism". Preventing students from being radicalised and holding "extremist" views is a safeguarding issue and we will approach this duty with that view.

The following definitions from the "Prevent Strategy" form our understanding of these terms:-

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism."

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faith and beliefs".

Our approach to this duty is multifaceted and cross curricular – please see the appendix.

Concerns in relation to students should be raised with the DSL in the same way as for all safeguarding concerns. Indicators of vulnerability can be found in the appendices.

Staff should be aware of the particular vulnerability of looked after children in that they are highly likely to have suffered previous abuse, be emotionally vulnerable and vulnerable to further abuse.

21. CHILDREN WHO ARE ABSENCE FROM EDUCATION

A student being absent from education repeatedly or for long periods or those going missing from education is a potential indicator of a range of safeguarding possibilities including abuse and neglect, sexual abuse or exploitation or criminal exploitation including county lines. It may also indicate mental health problems. The DSL will monitor unauthorised absence, working closely on support and interventions with the Attendance Officer, Heads of House and Student Support Team

We follow the DfE legal requirements for schools in respect of recording and reporting of children who leave school without any known destination and will work closely with the Education Welfare Service (EWS).

Where a student has 10 consecutive school days of unexplained absence and all reasonable steps* have been taken by the school to establish their whereabouts without success, the school will make an immediate referral to Plymouth City Council's Children Missing Education (CME) Service.

The CME can be contacted on 01752 307405 or by email to cme@plymouth.gov.uk

*Reasonable steps include:
- telephone calls to all known contacts
- letters home (including recorded delivery)
- contact with other schools where siblings may be registered
- possible home visits where safe to do so
- enquiries to friends, neighbours etc. through school contacts
- enquiries with any other services known to be involved with the student/family
- all contacts and outcomes to be recorded on the student's file

Upon receipt of a referral from the school, the CME Service will then continue to attempt to track the student, for at least a further 10 school days, using access to additional contacts/services, e.g. Housing. If this also fails to establish the student's whereabouts, the school will be informed to remove the student from roll and place the student's name on the School to School database, entering XXXXXXX in the box for destination. This will place the student on the list of Children Missing from Education.

Deletions from roll agreed with the CME Service will normally be backdated to the first day of absence.

If the CME Service is able to contact the student and her/his parents/carers, arrangements will be made with the school and family for a return to education, including a re-integration programme where

necessary. If the student has registered at another school, we will delete their name from our roll and transfer the student's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

Students leaving the school for known destinations outside the maintained sector in England and Wales will be updated to the School to School database using MMMMMMM in the destination box. This includes private/independent schools, schools in other countries (including Scotland and Northern Ireland) and students moving into Home Education. The latter will be formally notified to the EWO Home Education Officer by the school as soon as written confirmation is received from the parents/carers. If no confirmation is received the above Missing Children procedures will apply.

22.   ELECTIVE HOME EDUCATION (EHE)

Many home educated children have an overwhelmingly positive learning experience. However, this is not the case for all, and home education can result in safeguarding concerns. Since September 2016 schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work with key professionals and parents/carers where possible to ensure decisions are in the best interests of each child particularly where a child has SEND, is vulnerable, and/or has a social worker. Ultimately the choice to home educate rests with parents and carers and Plymouth Local Authority has responsibility to engage with parents/carers in relation to EHE.

23.   PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt.

However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent/carer of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.

The private foster carer becomes responsible for providing the day to day care of the child in a way, which will promote and safeguard her/his welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent/carer or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.

All staff in our school will inform the DSL of any children that fall into the category of private fostering.

24.   WORK EXPERIENCE

We work with Careers South West (CSW) to offer our Year 10 students a full week of work related learning, CSW are responsible for checking the suitability of placements. Where CSW identify that the placement will be supervised by a lone worker, they will notify the Head of House responsible for Work Experience and a DBS check will be carried out.

25.   CHILD ON CHILD ABUSE INCLUDING SEXUAL VIOLENCE AND HARASSMENT

All staff are aware that children can abuse other children and that it can happen both inside and outside of school and online. Staff receive training to recognise the indicators and signs of child on child abuse and how to respond to a report. It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys however, any and all reports of sexual violence or sexual harassment will be taken seriously. Victims will always be reassured and emotionally supported at all stages of an investigation.

Staff are also aware that even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported. As such where staff have any concerns regarding child on child abuse they will refer this to the DSL as a safeguarding issue.

Inappropriate behaviours between children will be challenged robustly. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours and will not be tolerated at DHSG.

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 peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Expectations of staff

- Staff recognise that child on child abuse occurs despite the robust policies and procedures put in place by the School.
- Staff understand that it is important to deal with a situation of child on child abuse immediately and sensitively.
- Staff are trained in dealing with incidents of child on child abuse and have an understanding of what constitutes, for example, cyber bullying, sexting and physical and verbal abuse.
- Staff understand that all allegations of child on child abuse are treated as safeguarding concerns and that potentially outside agencies may need to be involved.
- Staff understand the School's procedures on reporting safeguarding concerns.
- Staff acknowledge that they should not be prejudiced, judgemental or dismissive when dealing with such sensitive issues, but should offer immediate support in a calm and consistent manner.
- Staff are aware of the added vulnerability of children and young people who have themselves been abused and the risk that they may respond to this by abusing their peers, particularly those who are weaker or younger.

Preventative Strategies

- We have an open environment where students feel safe and we conduct regular student surveys to ensure that this is the case.
- All students are supported in discussing their concerns and worries by their Form Tutor and Head of House.
- We have a dedicated Student Support Team, including a lead who is also the School's Designated Safeguarding Lead.
- We have two counsellors provided by Young Devon and a CAMHS link worker who provide additional regular support to students and supervision for staff.
- We have separate weekly PSHEE, Citizenship and Social Studies lessons which give students a forum to talk openly about issues which may affect them and reflects Relationships, Sex and Health Education 2020.
- The School Nursing Service engages with students about Healthy Relationships and can offer 1:1 bespoke sessions when a particular need is identified.
- We have an active peer mentoring group which is supervised by the Inclusion Lead and Head of Sixth Form
- There are clear behavioural expectations in the school to support students, which includes rewards and responses to poor behaviour.
- There is an online platform for students who wish to report concerns without speaking to staff. Rely.

Procedure for Dealing with Allegations of Child on Child Abuse

If an allegation is made by a student against another, members of staff should treat it as a safeguarding concern. As such, it should be reported without delay to the DSL. It is important that staff do not attempt to investigate the circumstances at this stage.

Where possible two members of staff will manage reports of sexual violence and harassment between students (one being the DSL). The DSL will gather information from the student making the allegation and consider whether they are at risk of significant harm. If this is the case the DSL will contact the MASH and make a referral to Social Care. If the allegation indicates that a potential criminal offence has taken place, the DSL will also inform the police. If the police/social care are involved we will wait for their agreement before informing parents/carers. School based decisions in relation to students

in a multiagency lead investigation will be guided by this process and advice within the DfE 'Sexual violence and sexual harassment between children in schools and colleges' as well as in 'Keeping Children Safe in Education' statutory guidance. An immediate risk assessment will be lead by the DSL where there is a report of sexual violence (and for sexual harassment dependant upon the case).

The risk assessment will consider:

1. Support and protection for the victim
2. Any other victims
3. The needs of the perpetrator
4. All other members of the school community to prevent future harms

If the threshold of significant harm has not been met, the DSL will lead on a school based investigation:

- The DSL will speak separately to the students involved to gain a written statement of facts from them, using consistent language and open questions for each account.
- Any other evidence, witness accounts or images will be gathered.
- If the allegation involves youth produced sexual imagery, devices containing images will be confiscated, turned off and held securely until they can be handed over to the police. The UKCIS sharing nudes and semi-nudes: advice for education settings working with children and young people will be taken into account to prevent staff viewing or forwarding illegal imagery of children.
- Parents/carers, of both the alleged perpetrator and the alleged victim, will be informed at an early stage of the allegation and kept updated on the progress of the investigation.
- On the conclusion of the evidence gathering phase, outcomes will be determined by the DSL usually in consultation with the Head Teacher and informed by both the Behaviour for Learning Policy, student welfare and safeguarding needs.
- In situations where the school considers a safeguarding risk is present, a risk assessment will be completed, together with a support plan.
- The plan will be monitored and a date set for a follow-up review with everyone concerned.
- In a minority of circumstances we may consider that the alleged perpetrator is unable to be educated on site until the investigation is concluded. The student will then be provided with appropriate support and education whilst off site.
- Parents/Carers will be informed of the investigation outcomes in a face to face meeting.
- The DSL will make a written record of the investigation and any outcome and keep secure records on CPOMS.

Support for the student who has been harmed

The support the student requires will depend on the individual but we can offer support in a number of ways, for example:

- A support plan in the form of an anxiety management plan will be put in place, naming someone who they can talk to and listing support strategies for managing issues.
- Allocation of a peer mentor.
- Work with the Student Support Team.
- Counselling.
- Educational Psychologist referral.
- Referral to outside agencies including CAMHS.

Support for the student who has displayed harmful behaviour

It is important to establish why the student has behaved in such a way, this can be highly complex, they may have been harmed themselves in a similar way or may be experiencing their own difficulties. We will offer support and will consider the following:

- A risk assessment and support plan.
- A trusted adult for support will be identified.
- An Early Help Assessment (EHAT).
- A referral to outside agencies, including CAMHS or the Child Sexual Exploitation Team may be a requirement in the case of sexually harmful behaviour.
- Restorative justice and responses as appropriate.

Students will be made aware of the NSPCC helpline "Report Abuse in Education" 0800 126 663 (help@nspcc.org.uk.)

Unsubstantiated, unfounded, false or malicious reports

All concerns, discussions and decisions made in relation to child on child abuse including sexual violence and sexual harassment, and the reasons for those decisions, will be recorded in writing on CPOMS. Records will be reviewed by the DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the context of the report and the needs of the student making the report in determining outcomes, this includes both emotional support and potential consequences via the behaviour for learning policy.

26.   HARMFUL SEXUAL BEHAVIOUR

It is important to recognise that children do engage in sexual play and experimenting, which is usually age appropriate. Child sexual abuse is a subject many people find very difficult to talk about. It is important not to criminalise behaviour that is a perfectly normal and healthy part of growing up. However, the idea that children can sexually abuse others is still very hard for us to accept. The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern:

- There is an age difference of two years or more between the students
- One of the students is significantly more dominant than the other
- One of the students is significantly more vulnerable than the other e.g. in terms of disability, confidence, physical strength
- There has been some use of threats, bribes or coercion to secure compliance or to maintain secrecy

All staff in this school are aware of what constitutes sexual violence and the fact that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence, we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

-    **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 A does 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*.

*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 may 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.

We will always ensure that where a report of sexual violence and harassment is received, all victims will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence and harassment, and neither will a victim be made to feel ashamed of making a report.

In the context of child on child sexual harassment, all staff in this school are aware that we mean 'unwanted conduct of a sexual nature' that can occur both online and offline and 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.

Sexual harassment can include:

- sexual comments.
- sexual jokes or taunting.
- physical behaviour, such as brushing against someone, interfering with someone's clothes, or displaying pictures, photos or drawings of a sexual nature.
- online sexual harassment which may include non-consensual sharing of sexual images or videos; sexualised bullying; unwanted sexual comments and messages, including on social media; sexual exploitation, coercion and threats.

Girls and young women are more frequently identified as those who are abused by their peers, and report it having a negative impact on their lives, whereas boys and young men are more likely to be identified as abusers and less likely to say that partner abuse impacts them negatively (Barter 2011, Firmin 2011). However, boys and young men report high levels of victimisation in gang-affected neighbourhoods (Pitts 2008, Beckett et al 2013) and there is an increasing evidence base emerging on the sexual exploitation of boys and young men (although this is by adults as well as by peers) (Barnardo's 2014). The most important message to take from the research is that while young men and young women experienced child-on-child abuse they do so in gendered ways

We will be mindful of these gender issues when safeguarding against child on child abuse.

Any child on child allegation or concern must be referred to the DSL immediately. Where a concern regarding child on child abuse has been disclosed to the DSL, as part of the investigation, advice and guidance may be sought from Children Social Services 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 there will usually be an agreed response to the unacceptable behaviour, for example, if a student's behaviour negatively impacts on the safety and welfare of other students, then safeguards and a written risk assessment will be put in place to promote the well-being of all students as well as the victim and perpetrator. Support will be provided to prevent any reoccurrence of improper behaviour and the behaviour for learning policy will be applied.

Child on Child abuse will not be tolerated in this school and we will always take swift action to intervene. Please consult the Behaviour for learning policy for further information.

27.   HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The DSL is aware of referral routes in to the Local Housing Authority so they can raise concerns at the earliest opportunity. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help. In some cases, students are at risk of homelessness for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure appropriate referrals are made.

28.   VISITORS

All visitors to school will be welcomed in a cordial, efficient and purposeful manner. It is essential that our procedures for signing in and out of the school are followed by all visitors. Visitors will be asked to state the purpose of their visit and to confirm their status, by producing verifiable documentation. If there is any doubt as to the authenticity of this information, they will not be allowed entrance to the building. All visitors moving around the school site must wear a visitor's badge. If a member of staff is expecting a visitor they should provide the office with advance notice to ensure there is a clear plan.

All volunteer helpers and any individual employed on a short term basis to work with students must have a valid Disclosure Barring Service (DBS) check. Visitors who are in school for a "one off" visit do not require a DBS check, but must be accompanied throughout the visit. We have a clear "badging" system to identify visitors that must be accompanied at all times by a member of staff.

Staff from agencies including charities coming to school to work with students must have completed a DBS check and produce this to the Personnel Manager. Where appropriate a 'Letter of Assurance' will be sought from the agency and remain on file.

- If a member of staff is contacted by an outside agency or any individual requesting permission to visit lessons, observe teaching, attend assembly etc., permission must be obtained from a member of SLT before any agreement is made.
- Due diligence must be applied to ensure that speakers and users of the school site promote fundamental British values and the ethos of the school.
- We will ensure that appropriate arrangements are in place where our premises are used for non-school activities. We will seek assurances as a condition of use (hire or lease) that safeguarding requirements are in place and providers policies and procedures will be inspected. We will expect providers to meet guidance provided in "Keeping Children Safe in Out of School Settings". If we

receive an allegation from an incident occurring when organisations are using our premises we will follow our procedures including making referrals to the LADO.

Exemption to Visitor Requirements:
Parents/carers or visitors who have been invited to visit school as part of a scheduled open house, special event, scheduled performance by a class, team or group, or other adult participants in organised and school approved activities during off-school hours are exempt from requirements.

29. DEALING WITH A DISCLOSURE

If a student discloses information to you: it is essential to safeguard and not to contaminate evidence in case there is to be subsequent prosecution of the perpetrator. The following guidelines will help you to avoid this.

Do refer to your DSL
Do allow the student to do the talking
Do listen to, rather than directly question
Do listen quietly and encouragingly
Do remain calm and caring
Do allow the student to finish
Do explain you might have to tell someone
Do make notes at the earliest opportunity and use the students words as far as possible
Do complete a CPOMS log for the DSL if directed and include timing, setting and persons present as well as what was said and any noticeable non-verbal behaviour
Do provide a diagram to indicate the position of any injuries (CPOMS template)
Do keep and pass on any contemporaneous notes (with your signature)

Do not postpone or delay the opportunity to listen
Do not interrupt the flow of the disclosure
Do not interpret what you have been told, just record it
Do not allow your feelings, such as shock or pity to surface
Do not stop a student who is freely recalling significant events
Do not discuss with anyone other than the DSL

Do not ask leading questions.
No copies should be retained by the member of staff or volunteer.

30. SUPPORT

Dealing with a disclosure from a student, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for her/himself and discuss this with the DSL.

31. CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff in school.

- All staff in school, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of students with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police) where there are significant child protection concerns.
- If a student confides in a member of staff and requests that the information is 'kept secret', it is important that the member of staff tell the student in a manner appropriate to their age/stage of development that they cannot promise confidentiality – instead they must explain that they may need to pass information to other professionals to help keep them or others safe, but would let them know if this was the case.
- Staff who receive information about students and their families in the course of their work should share that information only within appropriate professional contexts, following the "Seven Golden Rules for information sharing" (see appendix) and Data Protection Act 2018 and the UK GDPR. Further advice can be found in "Information sharing: Advice For Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

32. COMMUNICATION WITH PARENTS / CARERS

We will undertake appropriate discussion to gain consent from parents/carers prior to involvement of another agency unless to do so would place the student at further risk of harm. We will ensure that parents /carers have an understanding of the responsibilities placed on the school and staff for safeguarding children.

33. RECORD KEEPING

The DSL is responsible for and will ensure that all safeguarding records are managed in accordance with the Education Statutory Legislation. All records pertaining to child protection will be maintained with strict chronology and confidentiality via CPOMS. If a student moves schools, the DSL will copy and transfer all safeguarding records separately to the relevant DSL in the new school within 5 working days. A record of this transfer will also be kept and evidence of receipt gained. In addition and within Data Protection Act 2018 and the UK GDPR the DSL will consider sharing information in advance of transfer with the new school (DSL) for complex cases to ensure continuity of care and safeguarding.

34. IF STAFF HAVE CONCERNS ABOUT A COLLEAGUE

Staff who are concerned about the conduct of a colleague - including visiting professionals, supply teachers and volunteers - towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the student is paramount. The school's whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of the school's Code of Conduct – to the Head Teacher;

to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protects students and reduces the risk of abuse in school.

Concerns or complaints about the Head teacher should be reported to the Chair of Trustees. Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary. The NSPCC also has a direct dial whistleblowing helpline if staff do not feel able to raise concerns regarding child protection failures internally – call 0800 028 0285 8 am to 8 pm Monday to Friday or e-mail help@nspcc.org.uk. Contact numbers for both services are available from the DSL and concerns can also be discussed with the DSL.

35.   ALLEGATIONS MADE AGAINTS/CONCERNS RAISED IN RELATION TO TEACHERS, SUPPLY TEACHERS, OTHER STAFF, VOLUNTEERS, AND CONTRACTORS

Trustees wish to protect students at all times and would always wish to view allegations in a broad and balanced manner which is at all times in keeping with our mission statement. We will manage all allegations and concerns in accordance with the agreed Plymouth Safeguarding Children Partnership. The Head Teacher will be informed and take the lead in situations where allegations and concerns are made with support from the DSL.

Allegations that meet the harms threshold
We have a duty of care to our employees and will act to manage and minimise the stress inherent in the allegation process. The case manager will appoint a named representative to keep the staff member informed of the progress of the case and consider what other support is appropriate for them.

We will contact the Local Authority Designated Officer (LADO) within 1 working day of receiving a concern which meets any of the following criteria:-

It appears that the person has:
- behaved in a way that has harmed a child, or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child in a way which may indicate that she or he poses a risk of harm if they continue to work regularly or deal with children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferable risk).

In addition, these procedures will be used if:-
- there are concerns about the person's behaviour towards their own children, or children unrelated to their employment or voluntary work, and there has been a recommendation from a strategy discussion that consideration should be given to the risk posed to children they work with.
- an allegation is made about abuse that took place some time ago and the accused person may still be working or having contact with children.

Initial response to an allegation meeting the harm threshold

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the child - the DSL will coordinate support for the child and will refer cases of suspected abuse to the MASH.

2. Investigating and supporting the person subject to the allegation - the case manager will report to and continue to liaise with the LADO and agree a course of action.

Employers have a duty of care to their employees and we will execute this duty by:
- managing and minimising the stress caused by the allegation
- informing the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
- advising the individual to contact their trade union representative, or a colleague for support
- appointing a named representative to keep the person informed about progress of the case
- providing access to counselling or medical advice where appropriate
- not preventing social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence

Parents or carers of the child or children involved will be:

- formally told about the allegation as soon as possible.
- The case manager will be guided by the LADO (and children's social care/police) on what information can be disclosed
- kept informed about the progress of the case, only in relation to their child
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002

Allegation outcomes
There are five potential outcomes following an investigation meeting the harms threshold:

- **Substantiated**: there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- **False**: there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Actions following the outcome will be discussed with the LADO and will range from taking no further action, to dismissal and referral to the DBS/TRA.

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO, case manager and DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help, in such circumstances the DSL will consider a MASH referral.
If an allegation is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it according to our behaviour for learning policy and disciplinary processes.

Record Keeping

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information.

- For all other allegations records will be kept as follows on a separate safeguarding file for that employee:
- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, and decisions reached and the outcome as categorised above
- a copy provided to the person concerned, where agreed by children's social care or the police
- a declaration on whether the information will be referred to in any future reference

Records will be kept at least until the employee is of normal pensionable age or a period of 10 years from the date of the allegation if this is longer.

Non recent allegations
Where an adult makes an allegation that they were abused as a child, we will advise them to report the allegation to the police and we will also report the allegation to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened and we will support all reported allegations in accordance with this principle.

Concerns that do not meet the harm threshold
Low level concerns may arise in several ways and from a number of sources, (including self-referral) as part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf DHSG are shared responsibly, with the right person, recorded and dealt with appropriately. Our commitment to an open and transparent culture enables the identification of concerning, problematic or inappropriate behaviour early and minimises the risk of abuse; and ensures that adults at DHSG are clear about professional boundaries and act within these boundaries. It also ensures that those working in or on behalf of DHSG are protected from potential false allegations or misunderstandings.

What is a low level concern?
The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold as set out previously. This could be behaviours that cause a sense of unease or a 'nagging doubt' - that an adult may have acted in a way that:
- is inconsistent with the staff code of conduct
- is inappropriate in conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

Our approach to low-level concerns will:

- ensure our staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empower staff to share any low-level safeguarding concerns with the Head Teacher (or in his absence, another member of the Senior Leadership Team).
- address unprofessional behaviour and support the individual to correct it at an early stage
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised
- Help to identify any weakness in our safeguarding system.

Sharing low-level concerns:

Low-level concerns about a member of staff should be reported to the Head Teacher (or in his absence, the DSL or another member of the Senior Leadership Team). For example, situations where they have found themselves or they have witnessed others in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Where a low-level concern is raised about the Head Teacher, it should be shared with the Chair of Trustees.

Recording low-level concerns

All reported low-level concerns will be recorded in writing by the Head Teacher (or in his absence, the DSL or another member of the Senior Leadership Team) and will include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible. These records will be kept confidential, held securely in a separate file by the Head Teacher and comply with Data Protection Act 2018 and the UK GDPR. Information on low level concerns will be kept until a colleague leaves DHSG employment and will not generally form part of a reference.

Records will be reviewed between the Head Teacher and DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and a course of action decided. This action could include consulting with the LADO and also a review of any wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Initial response to a Low-Level concern :

The Head Teacher, the DSL will:

- Provide a responsive, sensitive and proportionate handling of concerns when they are raised
- Speak directly to the person who raised the concern, unless it has been raised anonymously
- Speak to the individual involved for whom the low-level concern has been raised
- Speak to any witnesses
- categorise the type of behaviour causing concern
- Make a written record of all evidence collected
- Identify actions to be taken
- Provide a rationale for their decision making
- Liaise with the DSL

The Head Teacher may choose to delegate the investigation of low level concerns to the DSL or DDSL as appropriate. Please consult the appendices for copies of the relevant supporting low level concern forms.

The LADO for Plymouth is:
Sally Parma has been appointed as LADO.
01752 307569 or LADO@plymouth.gov.uk

We will not attempt to manage allegations or concerns which meet any of the above criteria through other mechanisms such as the School Complaints Procedure or Disciplinary Procedures, unless agreement to do so has been confirmed by the LADO.

We will provide the LADO, the Police and Children's Social Care with any personal data/information about staff members, Trustees, students or parent/carers which the said organisation(s) deem relevant to child protection enquires.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

Actions to be taken include making a written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, what was said and anyone else present. This record should be signed and dated and immediately passed on to the Head Teacher. Please see the "Managing Allegations/Concerns About Individuals who work with children" flowchart in the appendices for further clarity on actions and timeline.

If the concerns are about the Head Teacher, then the Chair of Trustees should be contacted.

The Chair of Trustees at DHSG is:

Mrs Vikki Frost

In the absence of the Chair of Trustees, the Vice Chair should be contacted.

The Vice Chair is:

Mrs Heather Cotton

36.   SAFER RECRUITMENT AND SELECTION

The school pays full regard to current DfE guidance "Keeping Children Safe in Education (KCSIE)" 2023, Children and Families Act 2014 and changes in Legislation brought in by the "Protection of Freedoms Act 2012", the Counter Terrorism and Security Act 2015 and Working Together to Safeguard Children 2023. We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the students as a safe and trustworthy adult, including supply teachers, volunteers and staff employed by contractors.

Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capability for the job. It also includes undertaking interviews

and where appropriate, checks with the Disclosure and Barring Service (DBS) and providing honest and accurate references when individuals move on. We will report any member of staff who has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, to the DBS and recognise that failure to do so is a criminal offence.

In line with statutory changes, underpinned by regulations, the following will apply:

- An Enhanced DBS Certificate will be obtained for all new appointments to our school workplace (including volunteers, where appropriate).
- An up to date single central record detailing a range of checks carried out on our staff, volunteers and Trustees is maintained.
- All new appointments to our school workforce from overseas or who have lived outside the UK will be subject to additional checks as appropriate.
- We ensure that supply staff have undergone the necessary checks and will be made aware of this policy.
- Identity checks will be carried out on all appointments to our school workforce before the appointment is made.
- All job advertisements carry a Safeguarding statement.
- We have several members of staff and Trustees who are Safer Recruitment trained and one of these staff members will be in attendance at interview for all staff appointments.
- All interviews will include at least two safeguarding question.
- We will also complete online searches in relation to social media profiles as recommended by KCSIE 2023. Short listed candidates will be made aware of this.

37.   ONLINE SAFETY, INCLUDING FILTERING AND MONITORING:

Technology has become a significant component of many safeguarding issues and can be grouped into four areas of risk:

1.   Content – being exposed to harmful materials online.
2.   Contact – being subjected to harmful interactions on line.
3.   Conduct – personal behaviour that increase the risk of online harm.
4.   Commerce – risks such as financial scams or phishing.

- The growth of different electronic media in everyday life and an ever developing variety of devices including PCs, laptops, mobile phones, tablets and wearable technology etc place an additional risk on our students. Internet chat rooms, discussion forums and social media can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships this also includes exposure to extremism and radicalisation. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.
- Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with students at this school.
- Students can engage in or be a target of bullying and sexual harassment using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture violent assaults of other children for circulation.

- A significant number of children either access or are exposed to adult pornography on-line which raises specific safeguarding concerns.

Due to the pervasive nature of Technology, any assessment of a students behaviour will also include an assessment of their on-line behaviour and we train our staff to recognise online safeguarding concerns in relation to contact, content, conduct and commerce, and report these concerns to the DSL.

Software is in place to block and monitor access to inappropriate web sites and direct referrals to the DSL are made by the Network team, as are identified by the DNA software. Filtering and monitoring is conducted in all languages spoken within School by this software.

We are cognisant of the DFF filtering and monitoring standards and use these and an annual SWGFL 360 review to review effectiveness via our online safety group – this feeds into whole school improvement planning (SIP).

The Network Manager, Ian Mason Laurence, is responsible for managing filtering and monitoring systems. This role is line managed by the Deputy Head Teacher, Mr Alan Thomas.

The online safety group comprises of: The DSL, Network Manager, Head of Computing, Deputy Head Teacher, Safeguarding Trustee and Senior Head of House.

However, the best protection is to make students aware of the dangers through curriculum teaching, particularly the contribution of PSHEE and Relationships and Sex and Health Education 2020 and the promotion of fundamental British values. Students are encouraged to discuss openly their use of technology and to report anything that makes them feel uncomfortable. If this results in Child Protection concerns, the DSL must be informed immediately.

Students should not give out their personal details, phone numbers, school attended, home address, computer passwords etc.

Staff should monitor the use of electronic devices in school and apply relevant responses for inappropriate use. The police may be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media. Students should adhere to the school guidance on the use of mobile phones. Please refer to the Behaviour for Learning, Acceptable Use and Anti-Bullying Policies for further guidance.

All staff and students have also been provided with safeguarding guidance in relation to online safety for remote learning where this is being used.

38.   ADVICE TO STAFF: MOBILE PHONES, EMAIL AND SOCIAL NETWORKING

This advice is given to ensure that staff are not doing anything which may be misconstrued as inappropriate by a student or by parents/carers. Please refer to the DHSG Code of Conduct for Teaching and Support Staff which can be found in the appendices for greater detail.

The following applies to contact in relation to all students including those in the Sixth Form. We would strongly recommend that it also applies to former students who have now left school.

Phone or Email contact between staff and students:
Staff must not use their own phone [mobile or home] to contact students [including text messages]. Any contact that may be necessary between staff relating to school work should be done via a school phone or via their school email account.

Staff must never give students their own mobile or home numbers.

Staff should never, without prior agreement with SLT or as part of trip/visit risk assessment, ask for a students' mobile telephone number, the <u>only</u> exception to this is where there is a need to safeguard the student – this should then be reported to the DSL and the number deleted/discarded.
The same situation applies to Email. Staff must use their school email address and not their personal email address to communicate with students.

School Visits:
Visit leaders must check with the DSL if any students on their trip have safeguarding concerns. Where this is the case they should work with the guidance of the DSL to prepare a risk assessment to ensure students are effectively safeguarded.

Several mobile phones have been purchased by the school for use on school visits. These are available and can been booked through the office.
If, for safeguarding reasons any member of staff feels that there is a need to use students' mobile phones during a school visit, then they must keep the list of students' numbers on paper and NOT on a staff/school mobile phone. This arrangement must be explicit in the risk assessment submitted to the EVC. This list must be shredded after the trip. Never give the students staff mobile numbers, although it is acceptable to give students the school mobile number.

Bluetooth:
Please be aware that 'Bluetooth Fishing' is a growing problem as is "air dropping" inappropriate images, as an example:

'A situation arose on a school visit when the coach on which a school party were travelling stopped at a motorway service station. One of the service station staff warned the staff that some adults (who they believed to be lorry drivers) were waiting for coaches full of 'kids' to arrive and were then bluetoothing their mobile phone numbers to random students in the hope of getting some kind of response. This did happen to some of the students who had their Bluetooth switched on at the time.'

This is a risk we must manage and the Party Leader of any school visit will need to build this into the appropriate risk assessment.

Social Networking via Facebook/Instagram/Snapchat and similar applications and Web sites:
Staff should be aware of the dangers of allowing any contact between school students and themselves using Social Media. Staff must never allow a student 'to be their friend' via such a platform or communicate with them via one.

Health and Safety

Our health and safety policy is reviewed each year by the Trustees.

The Head Teacher, with the staff member with responsibility for Health and Safety (Business Manager), the site supervisor and a Trustee with responsibility for Health and Safety oversee the policy and the Person in Charge (PIC) log book. Any concerns from staff, volunteers, Trustees or students are reported to any of the above and the site supervisor carries out an initial examination, assessing whether any remedial action needs to take place.

Fire (evacuation) and lockdown drills practicing efficient responses will take place throughout the year.

There is a School Emergency Plan that details what staff should do in the case of emergencies.

Site Security

We aim to provide a secure school site but recognise that the site is only as secure as the people who use it. All people on the site have to adhere to the rules, which govern it. It is recognised that laxity can cause potential problems to safeguarding. Therefore, the school ensures that:

- The electronic gate system is managed by the main office and safeguarding protocols applied.
- All staff and Sixth Form Students wear Identity Badges.
- All vehicles parked on site are registered with the Personnel team. Staff are issued with parking 'permits' to display in their vehicles.
- The rear gates and the pedestrian gate next to the footbridge are closed between 9.05 am and 3.35 pm.
- A one way vehicular route has been established.
- Delivery vehicles are instructed not to drive around the site but must trolley their deliveries again reducing traffic.
- Wherever possible visitors and volunteers only enter through the main entrance.
- All visitors to site sign in at the main office and are issued with Badges and Child Protection information. These are colour coded to identify visitors requiring supervision due to a lack of DBS Clearance.
- Students (Year 7 to 11) are only allowed home with adults/carers with parental responsibility or confirmed permission has been received in advance, if they sign out during the school day. (Any exception to this must be approved by a member of SLT with consultation with parents/carers).

39.   POSITIVE HANDLING AND THE USE OF REASONABLE FORCE

In order to maintain the safety and welfare of our students, it may sometimes be necessary to use reasonable force on a student, as permitted by law.

The policy has been written in accordance with the Department for Education guidance Use of reasonable force: advice for Head Teachers, staff and governing bodies (DfE-00060-2011) and takes account of the school's public sector equality duty set in section 149 of the Equality Act 2010.

Any use of force by staff will be reasonable, proportionate and lawful. Reasonable force will be used only when immediately necessary and for the minimum time necessary to prevent a student from doing or continuing to do any of the following:

- Committing a criminal offence
- Injuring themselves or others
- Causing damage to property, including their own

- Engaging in any behaviour prejudicial to good order and discipline at the school or among any of its students, whether that behaviour occurs in a classroom or elsewhere.

Please consult the separate policy document for further information.

40.   THE DESIGN OF THE CURRICULUM

The curriculum deals with safeguarding in two ways. Firstly, in subjects such as Personal, Social, Health and Economic Education (PSHEE) where, in particular, Relationships, Sex and Health Education (RSHE 2020) supports relevant discussions around related issues . Topics include such themes as Drugs, Alcohol, Sex and Healthy Relationships, E-Safety issues, and more complex issues such as Child Sexual Exploitation, FGM and Extremism.   Students are encouraged to explore and discuss these issues.

Secondly, the curriculum is designed to be broad and balanced and to promote fundamental British values. Safety issues within subjects are discussed and safe practices explained, such as using equipment properly in PE and Design and Technology. Appropriate staffing levels will be maintained at all times when the curriculum is being delivered outside of the school site. The lead adult always risk assesses visits to ensure students are safeguarded and protected from harm before the event is finally authorised by the Head Teacher. This is reviewed prior to approval by the School's Educational Visits Coordinator.

Visiting speakers, with correct clearance and/or constant supervision are always welcome into school so that they can give specialist knowledge to the students. Due diligence is applied to ensure speakers do not undermine British values.

Please see the Teaching and Learning Policy for further information.

41.   FIRST AID

For First Aid cover we have a minimum of two members of staff who are three day trained, in addition we train all interested staff in First Aid via the one day course. All visits must include a nominated First Aider in the staffing to gain approval. Staff in specialist areas (P.E./ /Technology/Science) have additional need for training and this is monitored by Heads of Department.

All First Aid staff are aware of the need to report suspicions of self harm to the DSL.
When a student is unwell or has suffered an accident in school or on the school grounds, the following steps are followed:

Step 1: The student reports to reception where First Aid is provided. Where a student is unable to attend reception a trained first aider is immediately called to provide assistance and advice at the student's location.

Step 2: The incident/accident is logged on an incident/accident form and any action taken by the First Aider is also recorded.

Step 3: The parent/carer is notified of the incident/accident as soon as necessary.

Step 4: The Local Authority Health and Safety Team and/or the Health and Safety Executive are notified of the incident/accident where there is a statutory duty to do so.

Please access the SEND Policy for information on supporting children with medical conditions.

42.   PHOTOGRAPHING AND VIDEOING OF STUDENTS IN SCHOOL

We have taken a sensible and balanced approach to photographing and videoing students on the school site. We have a formal policy around "Taking photographs and video images of students" and a copy of the document is available from the school website and the school office.

Taking pictures and video images of student's achievements and activities is a wonderful way of capturing a memory and promoting successes. This document explains in detail the school's requirement to obtain parental permission while taking such images and the processes in place to safeguard students.

43.   PARTNERSHIP WITH PARENTS/CARERS

- The school shares a purpose with parents/carers to educate, keep students safe from harm and have their welfare promoted.
- We are committed to working with parents/carers positively, openly and honestly. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents/carers' rights to privacy and confidentiality and will not share sensitive information until we have permission or it is necessary to do so to protect a student.
- We will share with parents/carers any concerns we may have about their child unless to do so may place a child at risk of harm.
- We encourage parents/carers to discuss any concerns they may have with us and we make parents/carers aware of our Safeguarding and Child Protection Policy. Parents/carers can view this policy on request and additional support and guidance is provided through the DHSG website.

Links with other policies:
This document should be considered within the context of other policies and documents relating to our work with children and young people.

Anti-Bullying Policy
Attendance Policy
Behaviour for Learning Policy
Drugs Policy
Equalities Policy
First Aid policy
Health and Safety Policy
Online Safety Policy
Learning and Teaching Policy
SMSC Guidance
Whistleblowing Policy

Actions where there are concerns about a child

Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead (1)

School/college action

Other agency action

Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help (2) and monitors locally

Referral (3) made if concerns escalate

Designated safeguarding lead or staff make referral (3) to children's social care (and call police if appropriate)

Within 1 working day, social worker makes decision about the type of response that is required

Child in need of immediate protection: referrer informed

Section 47 (4) enquiries appropriate: referrer informed

Section 17 (4) enquiries appropriate: referrer informed

No formal assessment required: referrer informed

Appropriate emergency action taken by social worker, police or NSPCC (5)

Identify child at risk of significant harm (4): possible child protection plan

Identify child in need (4) and identify appropriate support

School/college considers pastoral support and/or early help assessment (2) accessing universal services and other support

Staff should do everything they can to support social workers.

At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) 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 early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the 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).

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APPENDIX 1 - INDICATORS OF HARM

PHYSICAL ABUSE

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

Indicators in the child
Bruising
It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:
- bruising in or around the mouth
- two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- variation in colour possibly indicating injuries caused at different times
- the outline of an object used e.g. belt marks, hand prints or a hair brush
- linear bruising at any site, particularly on the buttocks, back or face
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- grasp marks to the upper arms, forearms or leg
- petechae haemorrhages (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing

Fractures
Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

There are grounds for concern if:

- the history provided is vague, non-existent or inconsistent
- there are associated old fractures
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement. Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.
- skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.

Mouth Injuries
Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

Poisoning

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self harm even in young children.

Fabricated or Induced Illness

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- discrepancies between reported and observed medical conditions, such as the incidence of fits
- attendance at various hospitals, in different geographical areas
- development of feeding / eating disorders, as a result of unpleasant feeding interactions
- the child developing abnormal attitudes to their own health
- non organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause
- speech, language or motor developmental delays
- dislike of close physical contact
- attachment disorders
- low self esteem
- poor quality or no relationships with peers because social interactions are restricted
- poor attendance at school and under-achievement

Bite Marks

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid. Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- a responsible adult checks the temperature of the bath before the child gets in.
- a child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet.
- a child getting into too hot water of his or her own accord will struggle to get out and there will be splash marks

Scars
A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

Emotional/behavioural presentation
- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted and fear of returning home
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of medical help
- Aggression towards others
- Frequently absent from school
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

Indicators in the parent/carer
- May have injuries themselves that suggest domestic violence
- Not seeking medical help/unexplained delay in seeking treatment
- Reluctant to give information or mention previous injuries
- Absent without good reason when their child is presented for treatment
- Disinterested or undisturbed by accident or injury
- Aggressive towards child or others
- Unauthorised attempts to administer medication
- Tries to draw the child into their own illness.
- Past history of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids
- Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care.
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child
- Wider parenting difficulties may (or may not) be associated with this form of abuse.
- Parent/carer has convictions for violent crimes.

Indicators in the family/environment
- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

EMOTIONAL ABUSE
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the 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, though it may occur alone.

Indicators in the child
- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Child scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Withdrawn or seen as a 'loner' - difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self harm
- Fear of parents/carers being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Depression, withdrawal
- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
- Low self esteem, lack of confidence, fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour

Indicators in the parent/carer
- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse.
- Abnormal attachment to child e.g. overly anxious or disinterest in the child
- Scapegoats one child in the family
- Imposes inappropriate expectations on the child e.g. prevents the child's developmental exploration or learning, or normal social interaction through overprotection.
- Wider parenting difficulties, may (or may not) be associated with this form of abuse.

Indicators of in the family/environment

- Lack of support from family or social network.
- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents/carers and/or siblings of the family
- Past history of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

NEGLECT

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

Indicators in the child
- Physical presentation
- Failure to thrive or, in older children, short stature
- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
- Swollen limbs with sores that are slow to heal, usually associated with cold injury
- Abnormal voracious appetite
- Dry, sparse hair
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea
- Unmanaged / untreated health / medical conditions including poor dental health
- Frequent accidents or injuries

Development
General delay, especially speech and language delay and inadequate social skills and poor socialisation

Emotional/behavioural presentation
- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at school

- Poor self esteem
- Destructive tendencies
- Thrives away from home environment
- Aggressive and impulsive behaviour
- Disturbed peer relationships
- Self harming behaviour

Indicators in the parent/carer
- Dirty, unkempt presentation
- Inadequately clothed
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child , e.g. anxious
- Low self esteem and lack of confidence
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties, may (or may not) be associated with this form of abuse

Indicators in the family/environment
- History of neglect in the family
- Family marginalised or isolated by the community.
- Family has history of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents/carers and/or siblings
- Family has a past history of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for child to play and learn

SEXUAL ABUSE

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

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

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

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

Indicators in the child
Physical presentation
- Urinary infections, bleeding or soreness in the genital or anal areas
- Recurrent pain on passing urine or faeces
- Blood on underclothes
- Sexually transmitted infections
- Vaginal soreness or bleeding
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Emotional/behavioural presentation
- Makes a disclosure.
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Self-harm - eating disorders, self-mutilation and suicide attempts
- Poor self-image, self-harm, self-hatred
- Reluctant to undress for PE
- Running away from home
- Poor attention / concentration (world of their own)
- Sudden changes in school work habits, become truant
- Withdrawal, isolation or excessive worrying
- Inappropriate sexualised conduct
- Sexually exploited or indiscriminate choice of sexual partners
- Wetting or other regressive behaviours e.g. thumb sucking
- Draws sexually explicit pictures
- Depression

Indicators in the parents/carers
- Comments made by the parent/carer about the child.
- Lack of sexual boundaries
- Wider parenting difficulties or vulnerabilities
- Grooming behaviour
- Parent/carer is a sex offender

Indicators in the family/environment
- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents/carers and/or siblings of the family

- Past history of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Family member is a sex offender.

Preventing Extremism and Radicalisation Guidance

We are committed to providing a secure environment for students, where they feel safe and are kept safe. All adults at DHSG recognise that safeguarding is everyone's responsibility, irrespective of the role they undertake, or whether their role has direct contact or responsibility for students or not.

Definitions:
- **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy, Home Office, 2011).

- **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas (Prevent Strategy, Home Office, 2011).

- An **ideology** is a set of beliefs (Prevent Strategy, Home Office, 2011).

There is no place for extremist views of any kind in our school, whether from internal sources - students, staff or Trustees, or external sources - school community, external agencies or individuals. Our students see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

As a school, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students, and so is addressed as a safeguarding issue. We also recognise that if we fail to challenge extremist views, we are failing to protect our students.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

Therefore, at DHSG we will provide a broad and balanced curriculum, delivered by skilled professionals, so that our students are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and are not marginalized.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by our students or staff will always be challenged and where appropriate, dealt with in line with our Behaviour for Learning Policy for students and the Code of Conduct or Disciplinary Policy for staff.

DHSG is clear that exploitation and radicalisation should be viewed as a safeguarding concern.

Response:
As part of wider safeguarding responsibilities staff will be alert to:
- disclosures by students of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where students have not actively sought these out.
- graffiti symbols, writing or art work promoting extremist messages or images
- students accessing extremist material online, including through social networking sites

- parental reports of changes in behaviour, friendship or actions and requests for assistance
- local context, local authority services, and police reports of issues affecting students in other schools or settings
- students voicing opinions drawn from extremist ideologies and narratives
- use of extremist or' hate' terms to exclude others or incite violence
- intolerance of difference, whether secular or religious or, in line with our equalities policy or attempts to impose extremist views or practices on others Anti-Western or Anti-British views

We are required to identify a 'Prevent Single Point of Contact' who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. This is the DSL at DHSG.

Indicators of susceptibility

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those susceptibilities.

- **Identity Crisis:** the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- **Personal Crisis:** the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- **Personal Circumstances:** migration; local community tensions; and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- **Unmet Aspirations:** the student may have perceptions of injustice; a feeling of failure; rejection of civic life;
- **Experiences of Criminality:** which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- **Special Educational Needs:** students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:
- being in contact with extremist recruiters;
- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations;
- significant changes to appearance and / or behaviour;

- experiencing a high level of social isolation resulting in issues of identity crisis and /or personal crisis.

The main aims of this guidance are to ensure that staff are fully engaged in being vigilant about radicalisation; that they overcome disbelief that such issues 'will not happen here' and ensure that we work alongside other professional bodies and agencies to ensure that our students are safe from harm.

Procedures for referrals

The DSL will discuss the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed. This includes referring to Channel (with consent of the individual), Social Services or the Police.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and Trustees to raise concerns relating to extremism directly.

Additional materials

Prevent strategy, GOV.UK – Home Office (Adobe pdf file)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

Learning Together to be Safe: A Toolkit to Help Schools Contribute to the Prevention of Violent Extremism was published in 2008 by the DCSF

Eating Disorders Guidance

School staff can play an important role in preventing eating disorders and also in supporting students, peers and parents/carers of students currently suffering from or recovering from eating disorders. Eating disorders can be seen as a form of self harm and are treated as child protection issues. Anorexia, for example, has the highest child mortality rate of any mental health condition.

Definition of Eating Disorders

Anyone can get an eating disorder regardless of their age, sex or cultural background. People with eating disorders are preoccupied with food and/or their weight and body shape, and are usually highly dissatisfied with their appearance. The majority of eating disorders involve low self-esteem, shame, secrecy and denial.

Anorexia nervosa and bulimia nervosa are the major eating disorders. People with anorexia live at a low body weight, beyond the point of slimness and in an endless pursuit of thinness by restricting what they eat and sometimes compulsively over-exercising. In contrast, people with bulimia have intense cravings for food, secretively overeat and then purge to prevent weight gain (by vomiting or use of laxatives, for example).

Risk Factors

The following risk factors, particularly in combination, may make a young person particularly vulnerable to developing an eating disorder:

- Difficulty expressing feelings and emotions
- A tendency to comply with other's demands
- Very high expectations of achievement
- A home environment where food, eating, weight or appearance have a disproportionate significance
- An over-protective or over-controlling home environment
- Poor parental relationships and arguments
- Neglect or physical, sexual or emotional abuse
- Overly high family expectations of achievement
- Being bullied, teased or ridiculed due to weight or appearance
- Pressure to maintain a high level of fitness / low body weight for e.g. sport or dancing

Warning Signs

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to an eating disorder. These warning signs should **always** be taken seriously and staff observing any of these warning signs should report these to the DSL.

- Weight loss
- Dizziness, tiredness, fainting
- Feeling Cold
- Hair becomes dull or lifeless
- Swollen cheeks
- Callused knuckles
- Tension headaches
- Sore throats / mouth ulcers
- Tooth decay

- Restricted eating
- Skipping meals
- Scheduling activities during lunch
- Strange behaviour around food
- Wearing baggy clothes
- Wearing several layers of clothing
- Excessive chewing of gum/drinking of water
- Increased conscientiousness
- Increasing isolation / loss of friends
- Believes s/he is fat when s/he is not
- Secretive behaviour
- Visits the toilet immediately after meals
- Preoccupation with food
- Sensitivity about eating
- Denial of hunger despite lack of food
- Feeling distressed or guilty after eating
- Self dislike
- Fear of gaining weight
- Moodiness
- Excessive perfectionism

Response

Following the report, the DSL will decide on the appropriate course of action. This may include:

- Referral to the SENCo
- Contacting parents / carers
- Arranging professional assistance e.g. doctor, nurse
- Arranging an appointment with a counsellor
- Arranging a referral to CAMHS
- Giving advice to parents/carers, teachers and other students

Students undergoing Treatment for / Recovering from Eating Disorders

The decision about how, or if, to proceed with a student's schooling while they are suffering from an eating disorder will be made on a case by case basis.

This decision will be informed by discussion with the student, their parents/carers, the SENCo and relevant medical team. An individual health care plan will be drawn up by the SENCo. Any requests for supervised eating will be managed by the Assistant Head Teacher in charge of Inclusion and SENCo and will require written requirements from CAMHS or similar medical practitioner for consideration.

The reintegration of a student into school following a period of absence will be handled sensitively and carefully and again, this will be supported through thorough consultation during both the planning and reintegration phase.

Self-Harm Guidance Document

Introduction
Recent research indicates that up to one in ten young people in the UK engage in self-harming behaviours, and that this figure is higher amongst specific populations, including young people with special educational needs. School staff can play an important role in preventing self-harm and also in supporting students, peers and parents/carers of students currently engaging in self-harm.   Self harming is a safeguarding matter and must be reported to the DSL without delay.

Scope
This document describes the school's approach to self-harm. It is intended as guidance for all staff including non-teaching staff and Trustees.

Aims
- To increase understanding and awareness of self-harm
- To alert staff to warning signs and risk factors
- To provide support to staff dealing with students who self-harm
- To provide support to students who self-harm and their peers and parents/carers

Definition of Self-Harm
Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- cutting, scratching, scraping or picking skin
- swallowing inedible objects
- taking an overdose of prescription or non-prescription drugs
- swallowing hazardous materials or substances
- burning or scalding
- hair-pulling
- banging or hitting the head or other parts of the body
- scouring or scrubbing the body excessively
- in some cases, Eating Disorders

Risk Factors
The following risk factors, particularly in combination, may make a young person particularly vulnerable to self-harm:

Individual Factors:
- Depression / anxiety
- Poor communication skills
- Low self-esteem
- Poor problem-solving skills
- Hopelessness
- Impulsivity
- Drug or alcohol abuse
- Having additional needs/SEN
- LGBT

Family Factors
- Unreasonable expectations
- Neglect or physical, sexual or emotional abuse
- Poor parental relationships and arguments
- Depression, self-harm or suicide in the family

Social Factors
- Difficulty in making relationships / loneliness
- Being bullied or rejected by peers
- Online behaviour that focus on self harm or suicide

Warning Signs

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should always be taken seriously and staff observing any of these warning signs should seek further advice from the Designated Safeguarding Lead (DSL).

Possible warning signs include:
- changes in eating / sleeping habits (e.g. student may appear overly tired if not sleeping well)
- increased isolation from friends or family, becoming socially withdrawn
- changes in activity and mood e.g. more aggressive or introverted than usual
- lowering of academic achievement
- talking or joking about self-harm or suicide
- abusing drugs or alcohol
- expressing feelings of failure, uselessness or loss of hope
- changes in clothing/appearance

Staff Roles in working with students who self-harm

Students may choose to confide in a member of school staff if they are concerned about their own welfare, or that of a peer. School staff may experience a range of feelings in response to self-harm in a student such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to students it is important to try and maintain a supportive and open attitude – a student who has chosen to discuss their concerns with a member of school staff is showing a considerable amount of courage and trust.

Students need to be made aware that it may not be possible for staff to offer complete confidentiality. If you consider a student is at serious risk of harming themselves then confidentiality cannot be kept. It is important not to make promises of confidentiality that cannot be kept even if a student puts pressure on you to do so.

The DSL will decide on the appropriate course of action. This may include:
- contacting parents/carers – we will inform parents/carers unless doing so would increase the risk of harm to the student
- formulating a safety plan
- arranging professional assistance e.g. doctor, nurse, social services or CAMHS
- arranging an appointment with a counsellor
- immediately removing the student from lessons if their remaining in class is likely to cause further distress to themselves or their peers

- in the case of an acutely distressed student, the immediate safety of the student is paramount and an adult should remain with the student at all times
- if a student has self-harmed in school a first aider should be called for immediate help

This information should be recorded within CPOMS.

It is important to encourage students to let you know if one of their group is in trouble, upset or showing signs of self-harming. Friends can worry about betraying confidences so they need to know that self-harm can be dangerous and that by seeking help and advice for a friend they are taking responsible action & being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult the DSL.

When a young person is self-harming it is important to be vigilant in case close contacts with the individual are also self-harming. Occasionally schools discover that a number of students in the same peer group are harming themselves.

Considerations

The objective must be to minimise opportunities for students to self harm and keep them safe from harm whilst attending school. Where a student is high risk and their safety cannot be maintained through safety planning, students are likely to be medically unfit for school. We will work closely with CAMHS and Parents/Carers where this might be the case.

It will be made clear as part of safety planning conversations with young people who self harm and their Parents/Carers that carrying a bladed article or offensive weapon (which is defined as "any article made or adapted for use to cause injury to the person") at school is a criminal offence and may result in Police involvement in some circumstances.

Safeguarding Advice for Visitors

At DHSG we are committed to safeguarding and meeting the needs of all our students.

- We follow the guidance and protocols outlined by the Plymouth Safeguarding Children Partnership.
- A copy of our Safeguarding and Child Protection Policy is available on the school website.
- This leaflet will provide you with some useful advice when visiting us.
- When signing in, if visitors have a mobile device they will be asked to switch it off and keep it out of sight between the hours of 8.00am and 3.35pm.

Our first priority is that ALL students feel safe and happy in our school

Designated Safeguarding Lead (DSL)

Mrs R Morgan

Safeguarding
Safeguarding is everyone's business: it's up to all of us to keep children safe.

A key priority for us is that all adults who work with our students take account of safeguarding and promote the welfare of children and young people. Our aim is to promote a culture of being a safe organisation for young people and the adults who work with them.

This is approached by:

- Ensuring DBS checks are carried out on all who work directly with students or have access to their personal information
- Developing recruitment practice in line with guidance on safer recruitment practices
- Working to promote a safe culture where there is common understanding of risk management and judgement in relation to safeguarding
- Ensuring allegations are dealt with quickly, fairly and with transparency and staff operate safe practice that does not leave them open to misunderstanding or malicious allegations
- Giving staff guidance and training to enable them to recognise concerns about children and young people and take responsibility for acting quickly on those concerns
- Communicating child protection procedures to all staff, parents/carers and visitors
- Ensuring that every individual signs an Acceptable Use Policy (AUP) before using the school network and abides by the conditions of that policy.

We ask that should you hear, see or read anything which troubles you about a child or young person, do not ignore it, but report your concerns to our Designated Safeguarding Lead (DSL):

Mrs R Morgan: Assistant Head Teacher (DSL)
Dr D Parry: Senior Head of House (Deputy DSL)

Our Safeguarding Link Trustee is Mrs E Blakeman.

What are my responsibilities as a visitor?
All of those who come into contact with students through their paid or voluntary work are responsible for their own actions and behaviour. We all have a duty to safeguard and promote the welfare of students. Visitors should act promptly if they witness any incident which could give rise to a concern. All incidents must be reported to the DSL.

DBS Checks

Staff, including supply staff, regular visitors and volunteers are subject to a DBS Check, through the Disclosure and Barring Service (DBS). This is to help ensure that unsuitable people are prevented from working with children.

All supply teachers are DBS checked – documents are held by our Personnel Assistant who is responsible for maintaining the Single Central Record.

All visitors who are DBS checked will be issued with a lanyard and badge. Other visitors will be red badged and accompanied by a member of staff at all times. They will not be allowed to work alone with our students at any time. This helps to protect both our students and the visitors themselves.

Signing in and out

All visitors must sign in using the signing in book at reception. Please include a note of any vehicle registration so that if there is a problem we can notify the relevant person. Visitors will be issued with an identity badge which must be worn at all times. When leaving the site all visitors must sign out and return their badge to reception.

What should I do if I am worried about a student?

If whilst visiting us you become concerned about a student, for example:

- Comments made by the student
- Marks or bruising on the student
- Changes in the student's behaviour or demeanour

Please report these concerns as soon as possible to the DSL named in this booklet.

What should I do if the student discloses that she/he is being harmed?

In the event of a student disclosure:

- Listen to what is being said, without displaying emotion
- Allow the student to talk freely
- Do not ask leading questions
- Reassure the student and ensure that they are aware that anything they say cannot be kept confidential, that you will need to share it with a member of the safeguarding team
- Do not compromise confidentiality by discussing with people other than a member of the Safeguarding Team
- Reassure the student that telling you was the right thing to do.

Record details of the disclosure immediately in writing, including where possible the exact words or phrases used by the student. Report your concerns and give your written records to the DSL immediately.

What should I do if an allegation is made against a member of school staff?

Immediately inform the DSL named in this leaflet or the Head Teacher

How do I assure that my behaviour is always appropriate?

- Always be a positive role model by behaving in a mature, respectful, safe, fair and considered manner
- Appropriate relationships with students should be based on mutual trust and respect
- Treat all students equally and never build 'special' relationships or confer favour on particular students
- Do not photograph students or exchange emails, texts, phone numbers or share your personal details – this includes communication via social media
- Refer to our Behaviour for Learning policy to ensure that you understand the school's expectations

Fire Evacuation procedure

If you discover a fire, press the nearest fire alarm button and tell a member of staff. The member of staff must advise the school office of the fire. The member of staff should assume the safety of students as a priority and, if practical, attempt to extinguish the fire using an appropriate fire extinguisher.

The Visitors' assembly point is in front of the school by the Tennis courts. Please report to the fire attendance officer at the assembly point who will have the visitor log. No-one may re-enter the building once the alarm has sounded, until given permission by the Head Teacher or member of SLT in charge.

Thank you for helping us at DHSG to safeguard the students in our care by adhering to the guidelines set out in this leaflet

Appendix 3

Devon & Cornwall Police
Building safer communities together

July 2023

PLYMOUTH
CITY COUNCIL

Dear Parent/Carer,

Operation Encompass

'Operation Encompass is as powerful as it is simple, and can make a real difference to a child's day. It has the well-being and safety of children at its very core' - Councillor Nicky Williams, Cabinet Member for Children and Young People (2013).

We are pleased to be involved in Operation Encompass is a national scheme that operates jointly between schools and Police Forces.

Encompass ensures that at least one member of staff, known as the 'key adult' is trained to liaise with the police and to use the information that has been shared, in confidence. In this way, we aim to support each young person who has experienced a domestic abuse incident. The key adult at Devonport High School for Girls is Mrs R Morgan. If she receives an Encompass notification, she will make sure that a person the young person trusts, is available to help the next day - if the young person needs this. Most of the time we will do nothing except keep a watchful eye to make sure the young person has a calm day and feels as safe and secure as possible.   The Domestic Abuse Act identifies children who experience domestic abuse as victims of domestic abuse in their own right.

The confidential information received regarding the incident is ordinarily not shared with other staff – they may just be asked by the key adult to keep an extra close eye on the young person. All schools/settings do however have a duty to share information with other organisations if they feel a child or young person has been or is at risk of significant harm. There may be times therefore that the key adult must contact other organisations to share the information received. This is referred to in our child protection policy.

We are keen to support both children and families. Parents/carers can come and talk to our key adult or whoever they feel most comfortable with if they choose. We can then advise other people that can help.

The police will continue to support Operation Encompass and local officers from our Neighbourhood Policing Teams are available to visit us at pre-arranged times to help support our students and offer guidance to parents/carers who feel they would benefit from advice around domestic abuse.

Head Teacher

Appendix 3

Youth Produced Sexual Imagery Guidance

All incidents involving youth produced sexual imagery will be responded to in line with our child protection policy and recorded accordingly. This guidance only covers the sharing of sexual imagery by young people.

'Youth produced sexual imagery' best describes the practice rather than 'sexting' because:
- 'Youth produced' includes young people sharing images that they, or another student, have created of themselves.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

The types of incidents which this advice covers are:
- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

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

1) Why might young people engage in these activities?
The NSPCC says there are many reasons including:
- joining in because they think that 'everyone is doing it'
- boosting their self-esteem
- flirting with others and testing their sexual identity
- exploring their sexual feelings
- to get attention and connect with new people on social media
- they may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent

2) What the Law Says
Youth produced sexual imagery could be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A student is breaking the law if they:
- Take an explicit photo or video of themselves or a friend
- Share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

However, as of January 2016 in England and Wales, if a student is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.

3) Age considerations

When considering appropriate action the Designated Safeguarding Lead (DSL) will take the age of the student/s involved and the context into account. Students under 13 are given extra protection from sexual abuse under the Sexual Offences Act 2003, sexual activity with a child under 13 can never legally give consent to engage in sexual activity. This applies to children who have not yet reached their 13th birthday. Any incidents involving children under 13 will be taken very seriously.

4) Sexual behaviour

The DSL will be mindful that behaviour which may not initially appear to be sexually motivated may have occurred as a result of risky or harmful behaviour or indeed sexual abuse being 'normalised' for children and the DSL will liaise with external agencies where appropriate. This is essential to ensure that children involved or identified are safeguarded and are not unnecessarily criminalised or labelled.

5) Initial response to disclosures of youth produced sexual imagery

- The incident must be referred to the DSL immediately
- The DSL will gather information from appropriate school staff
- The DSL will interview the student/s involved (if appropriate)
- Parents/carers will be informed at an early stage unless there is good reason to believe that involving parents/carers would put the student at risk of harm
- At any point in the process if there is a concern that the student has been harmed or is at risk of harm a referral will be made to The MASH and/or the police immediately.

6) Searching devices, viewing and deleting imagery

Staff should not view youth produced sexual imagery unless there is good and clear reason to do so. To do so could be an offence.

Wherever possible responses to incidents should be based on what the DSL has been told about the content of the imagery. The decision to view imagery will be based on the professional judgement of the DSL, imagery will not be viewed if this causes significant distress or harm to the student.

The DSL must be satisfied that viewing imagery:
- Is the only way to make a decision about whether to involve other agencies.
- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the student or parent/carer in making a report
- Is unavoidable because a student has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL will:
- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Head Teacher.
- Ensure viewing takes place with another member of staff present in the room, ideally a member of the Senior Leadership Team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school premises, ideally in a member of the Senior Leadership Team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the student in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions.

Viewing youth produced sexual imagery can be distressing, if imagery has been unavoidably viewed by a member of staff then the DSL will ensure that the staff member is provided with appropriate support.

7) Information gathering

The initial investigation will consider the evidence and aim to establish:
- Whether there is an immediate risk to a student or other young people.
- If a referral should be made to the police and/or the MASH.
- If it is necessary to view the imagery in order to safeguard the student.
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and/or platforms.
- Whether immediate action should be taken to delete images from devices or online services.
- Any relevant facts about the student/s involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the students involved.

An immediate referral to police and/or the MASH will be made if:
- The incident involves an adult.
- There is coercion, blackmail or grooming, or concerns about their capacity to consent.
- Known content depicts violent sexual acts or are unusual for the student's developmental stage.
- The imagery involves sexual acts and any student in the imagery is under 13
- There is reason to believe a student is at immediate risk of harm owing to the sharing of the imagery, for example, the student is presenting as suicidal or self-harming

If none of the above applies then we may decide to respond to the incident without involving the police or the MASH (although escalation of the incident can occur if further concerns come to light).

The decision to respond to the incident within the school setting alone, will only be made in cases when the DSL is confident that they have enough information to assess the risks to students involved and the risks can be managed within the school's pastoral support and disciplinary framework.

8) When assessing the risks the following should be considered:

The DSL will use their professional judgement in conjunction with their colleagues to assess incidents.

- Why was the imagery shared?
- Was the student coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the student in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the students involved?
- Do the students involved have additional vulnerabilities?
- Does the student understand consent?
- Has the student taken part in this kind of activity before?

9) Securing and handing over devices to the police

Devices containing youth produced sexual imagery will be confiscated for the duration of the investigative process. Decisions about what to do with imagery/devices will form part of the investigation; this may be to pass confiscated devices to the Police, into the care of parents/carers, or to the student to delete the images from the device.

10) The MASH and children's social care

Whether or not the DSL decides to make a referral to the MASH, if they are aware that children's social care are currently or historically involved with a student involved in an incident of youth produced sexual imagery, they will contact the MASH to share information.

11) If we have decided that other agencies do not need to be involved

The law concerning Searching, Screening and Confiscation in school settings provides the power to search students for devices, search data on devices and delete youth produced sexual imagery.

However, we will only search devices and delete where there is clear reason to do so. In most cases students will be asked to delete imagery and to confirm that they have deleted the imagery. Students will be given a deadline for deletion across all devices, online storage or social media sites. Students will be reminded that possession of youth produced sexual imagery is illegal, if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. We will invoke at our discretion and in line with our behaviour policies, disciplinary measures to discourage our students from sharing, creating or receiving images.

DEVONPORT HIGH SCHOOL FOR GIRLS

STAFF CODE OF CONDUCT

Named person: L Sargeant

Category: Statutory

Date to be reviewed: Summer 2024

This policy has been reviewed with regard to the work/life balance of staff.

Adopted by the Trustees on: 15/05/2023

Contents

1. **Purpose**

   This Code of Conduct is designed to give clear guidance on the standards of behaviour all employees are expected to observe and the importance of enacting the School's mission and ethos.

2. **Scope**

   This Code of Conduct applies to all employees. This Code of Conduct does not form part of the contract of employment. Casual and self-employed workers, agency staff and volunteers working in the school would also be expected to observe the standards of behaviour set out in this document.

   In addition to this policy, all employees must adhere to statutory guidance, in particular the most recent version of Keeping Children Safe in Education.

   Those engaged to work under Conditions of Service for Schools Teachers have a statutory obligation to adhere to the most recent 'Teachers' Standards' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

3. **Principles**

   Employees working in schools are role models, are in a position of influence and must demonstrate behaviour that sets a good example to all the pupils. As a member of the DHSG community, every employee has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours.

   In adopting this policy, the School is committed to working towards creating a working environment in which all employees are treated fairly, with dignity and respect and where unacceptable behaviour will not be tolerated.

4. **Compliance**

   Employees must familiarise themselves and comply with all policies and procedures adopted by the School and within the school they are deployed to work within. Employees must complete their annual declaration to confirm they have read, understood and agreed to comply with this policy.

5. **Disciplinary Action**

a. Employees should be aware that a failure to comply with this policy could result in disciplinary action including but not limited to summary dismissal.

b.   Where allegations of a safeguarding nature have been made against a member of staff, this will be investigated fully in line with the School's Disciplinary Policy.

6.   **Setting an Example**

a.   This document helps all employees to understand what behaviour is and is not acceptable. Regard should be given to the disciplinary rules set out in the School's Disciplinary Policy.

b.   Employees must promote a working environment which is free from intimidation, harassment and victimisation.

c.   Employees must not unfairly discriminate against someone because they have or are perceived to have a protected characteristic as defined by the Equality Act 2010 or are associated with someone who has a protected characteristic. Protected characteristics are:

- Age
- Sex
- Disability
- Gender Reassignment
- Pregnancy/ Maternity
- Marriages / Civil Partnership
- Religion or Belief
- Sexual Orientation
- Race

d.   Employees must set good examples of behaviour and demonstrate high standards of conduct in order to encourage our pupils to do the same. Examples of standards expected of employees can be found in the appendix.

e.   Employees must avoid using inappropriate or offensive language at all times.

f.   Employees must avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

7.   **Safeguarding Pupils**

a.   Employees have a duty to safeguard pupils from physical abuse, sexual abuse, emotional abuse, verbal abuse and neglect.

b.   The duty to safeguard pupils includes the duty to report concerns about a pupil or colleague (including someone providing supply, a volunteer or a contractor) to the School's Designated Safeguarding Lead (DSL). This includes, but is not limited to, where it is alleged that the person has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she 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.

c. Employees must make themselves aware of the name of the School's current DSL. This information is available on noticeboards around the school and in the Staff Handbook.

d. Employees must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.

e. Employees must never promise a pupil that they will not act on information that they are told by the pupil.

f. Employees must only make physical contact with pupils where is it is absolutely necessary and employees should use their professional judgement to determine the appropriateness of contact at all times.

g. Employees have the ability, in specific and clear circumstances, to restrain pupils where there is a risk of harm to the pupil or another individual. Any restraint used against a pupil must be done so in line with the School's Behaviour Policy/Positive Handling Policy.

h. Employees are provided with access to the School's Child Protection and Safeguarding Policy and Whistleblowing Procedure and must become familiar with these documents.

i. Employees are provided with access to a copy of the DfE Statutory Guidance Document 'Keeping children safe in education' and must read the document.

j. Employees are provided with access to a copy of the 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' and must read the document.

8. **Low Level Concerns**

a. In accordance with 'Keeping Children Safe in Education, where there are any concerns regarding the behaviour of any adult working in or on behalf of the School (including supply teachers, volunteers and contractors), concerns should be reported to the Headteacher immediately using the schools internal process.

b. A low-level concern is any concern – no matter how small, and even if no more than a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:
   - is inconsistent with the staff code of conduct
   - is inappropriate in conduct outside of work
   - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

   Examples of such behaviour could include, but are not limited to:
   - being over friendly with children
   - having favourites
   - taking photographs of children on their mobile phone
   - engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- using inappropriate sexualised, intimidating or offensive language.

c. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances staff will always advise their senior colleagues of their justification for any such action already taken or proposed.

d. Our open and transparent culture enables our School to identify concerning, problematic or inappropriate 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 DHSG.

e. These incidents may be dealt with informally, however, more formal action may be required depending on the circumstances such as where misconduct is serious or repeated.

9. **Relationships with Pupils**

a. Employees must declare any relationships that they may have with pupils (including former pupils under 18) outside of school; this may include mutual membership of social groups, tutoring, or family connections/ relationships with parents. Employees should not assume that the School are aware of any such connections. A declaration form is provided to all employees at the beginning of each academic year/start of their employment.

b. Physical relationships with pupils, regardless of their age, are strictly forbidden and may lead to a criminal conviction. This may also apply to former pupils and advice must be sought before commencing any such relationship.

c. If a student or parent attempts to make contact with an employee through a non- professional source (personal social media account/telephone number/home address) the employee must not respond using their personal account(s) and this contact should be declared to the Head Teacher (for the Head Teacher this should be the Chair of Trustees).

d. Employees must only contact pupils via school authorised mechanisms. At no time should personal telephone numbers, email addresses or communication routes via personal accounts on social media platforms be used to communicate with pupils.

e. Employees must treat pupils with respect and dignity and must not demean or undermine them, their parents or carers, or work colleagues. Employees must not behave in a way that may be perceived as sarcastic, nor should they make jokes at the expense of pupils, embarrass or humiliate pupils, discriminate against or favour pupils.

10. **Professional Relationships with Colleagues**

a. Employees must help create a positive working environment and behave in a manner which ensures and promotes acceptable behaviour. Examples of acceptable behaviour and unacceptable behaviour can be found in the appendix.

Employees must strive toward and promote harmonious and professional relationships with all colleagues. It is understood that, at times, differences of opinions can occur and at such times it is expected that employees will attempt to resolve matters informally in the first instance unless they feel unable to do so in which case they should refer the matter to their line manager.

11. **Honesty and Integrity**

a.   Employees must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of School property and facilities.

b.   Employees must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If you believe that a person has failed to comply with the Bribery Act, you should refer your concerns to the attention of your Head Teacher.

c.   Gifts and hospitality can only be accepted when in accordance with the School's Gift and Hospitality section in the Finance Policy. Employees should not accept gifts or hospitality from suppliers or associates of the School, with the exception of 'one off' token gifts from parents. Personal gifts from employees to pupils are inappropriate and could be misinterpreted and may lead to disciplinary action. A record will be kept of all gifts received in accordance with the policy. Please refer to the Finance Policy for further details.

d.   Employees must make known to the Head Teacher all financial and non-financial interests that could bring them into conflict with the School's interests.

e.   Where employees have any involvement in the procurement of services, all personal relationships with contractors, or potential contractors should be made known by the employee to the Head Teacher with responsibility for the contract.

f.   Employees must not be involved in any recruitment process if they have a personal relationship with the applicant inside or outside of work.

g.   Without fear of recrimination, employees can report any impropriety or breach of procedures using the process laid out within the School's Whistleblowing Policy.

12. **Conduct Outside of Work**

a.   Employees must not engage in conduct outside work which could damage the reputation and standing of the School or the employee's own reputation or the reputation of other members of the DHSG community.

b.   Criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct will be regarded as unacceptable and dealt with under the School's Disciplinary Policy.

c.   Behaviour or activities that have the potential to make employees unsuitable for the role they

are employed to perform will be dealt with under the Disciplinary Policy.

13.   **Employment outside of School**

a.   Employees may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the School nor be to a level which may contravene the working time regulations or affect an individual's work performance in the school. In line with the contract of employment, all staff employees who are employed full time must seek the consent of the Head Teacher should they wish to take up employment outside the School.

14.   **Computer, Mobile Devices and Online Activities**

a.   Employees must exercise caution when using information technology and be aware of the risks to themselves and others. All Employees should adhere to the requirements set out in the Computer, Mobile Device and Online Use Policy at all times both inside and outside of work.

b.   Employees must not use equipment belonging to the school to access pornography; neither should personal equipment containing pornographic images or links to them be brought into the workplace or connected to the School network. Doing so will raise serious concerns about the suitability of the employee to continue to work in schools.

c.   Employees must not engage in inappropriate use of social network sites which may bring themselves, the School, the community, or employer into disrepute. Employees should ensure that they adopt suitably high security settings on any personal profiles they may have.

d.   Employees must exercise caution in their use of all social media or any other web-based presence that they may have, including written content, videos or photographs, and views expressed either directly or by 'liking' certain pages or posts established by others. This may also include the use of dating websites where employees could encounter pupils either with their own profile or acting covertly.

e.   Employees must not respond to negative comments posted online but bring this to the attention of the Head Teacher.

f.   Photographs/still images or video footage of pupils should only be taken using school equipment, for purposes authorised by the school and in accordance with GDPR regulations. The use of such material should always be transparent and only occur where parental consent has been given. The records should be stored and destroyed in accordance with the Data Protection Policy.

g.   Staff must only contact parents and carers using school telephone numbers, email addresses and social networking sites that are set up for professional purposes and approved by their line manager. It is prohibited for staff to use their personal contact details to contact parents and carers.

15. **Confidentiality**

a. Employees must adhere to the requirements of the School's Data Protection Policy.

b. Employees must not reveal confidential information about pupils or their parents or carers except to those colleagues who have a professional role in relation to the pupil and in accordance with the General Data Protection Regulations 2018.

c. Employees are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil (or by another employee), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the pupil's parent or carer, nor with colleagues in the school except with a senior member of staff with the appropriate authority to deal with the matter.

d. Where there is a genuine requirement to transfer data which is of a sensitive nature, appropriate systems should be utilised to ensure that the data is encrypted and only when essential, postal mail is sent securely using a special delivery service or equivalent.

e. Any breaches in the transfer of confidential information should be reported immediately to the School's Data Protection Officer.

16. **Dress and Appearance**

a. Employees must dress in a manner that is appropriate to a professional role and promotes a professional image and meets the requirements for Health and Safety. Employees must model to students that business wear is the appropriate dress and their attire.

17. **Car and Transport use**

a. If employees need to transport a student in their car they should always be accompanied by another employee, unless the situation is such that the life of a child is in danger.

b. When transporting pupils Employees must adhere to the relevant trips/visits policies.Employees should ensure that any student is transported in the rear of the vehicle, wearing the appropriate seat belt.

c. Employees who utilise their vehicle for work must have:

- a valid MOT certificate in place and ensure that the vehicle is in a good roadworthycondition; and
- confirmation that your vehicle has the appropriate road tax and insurance.

d. Claims for mileage and allowances will processed in accordance with the School's Finance Policy and expenses section.

18. **Health and Safety**

a. Every school has a legal duty of care for the health, safety and welfare of its employees. In addition, all employees must take reasonable steps to protect the health and safety of themselves and others in the workplace. As such, you have a duty to help prevent accidents and injuries at work through:
- Complying with all instructions relating to health, safety and security procedures
- Using supplied protective clothing and equipment
- Complying with hygiene requirements
- Reporting any hazard, accidents, defects or incidents to your manager at the earliest opportunity
- Following the local procedures as soon as the fire alarm sounds and follow any instructions given
- Following the Health and Safety policy

19. **Smoking and Alcohol Use**

Employees must not:
- Report for duty less than fully competent due to drinking alcohol
- Report for duty under the influence of illegal drugs
- Drink alcohol whilst in the workplace, in any school vehicle or whilst on duty, including when on call
- Be in possession of, consume or supply any controlled drug in the workplace, in any school vehicle or whilst on duty, with the exception of appropriately prescribed medication
- Present an unprofessional image of the school due to drinking alcohol during breaks or immediately before work
- Employees must not smoke or vape in the workplace or in any school vehicle.
- Employees must smoke or vape in designated smoking areas at times which are authorised.
- Failure to adhere to the above will result in disciplinary action and may result in summary dismissal.

Appendix

Examples of Acceptable Behaviour

People behave acceptably when they:

- Afford dignity, trust and respect for everyone and themselves;
- Have awareness of the effects of their behaviour on others and only make reasonable and manageable demands;
- Communicate honestly and openly, clearly stating what they need and expect of others;
- Provide and are receptive to honest feedback based on evidence; and
- Challenge discriminatory language and behaviour in an appropriate way.

Examples of Unacceptable Behaviour:

- Using aggressive language, threatening, ridiculing, ignoring people or repeatedly shouting;
- Telephoning people at home unnecessarily (for example, demanding work when the person is absent due to sickness or ill health);
- Focusing only on weaknesses;
- Bringing up details of someone's private life inappropriately;
- Leaving impossibly long lists of tasks and making unreasonable demands;
- Criticising people or maliciously gossiping about them in their absence;
- Ridiculing or demeaning someone – picking on them or setting them up to fail;
- Comments or jokes, about distinctive peoples and nationalities;
- Frequent comments about aspects of physical appearance or using forms of address that are demeaning;
- Threatening or implying, without reason, that, as a colleague, you will cause the person to lose his/her job or fail to get a promotion or suffer some other form of career difficulty or financial disadvantage;
- Coercing someone to join the harassment/bullying of another person;
- Excluding or marginalising someone or refusing to engage with them appropriately.

This list is not exhaustive. It is simply a guide to help individuals consider their own and others behaviour and gain understanding of what behaviours are unacceptable in the workplace.

Standards Expected of Employees

The standards expected of all employees include but are not limited to:

- maintaining standards of behaviour in keeping with the interests and standing of the School. This includes behaviour outside of working hours and in any form that is visible to the public, including social networking or any other electronic medium;
- devoting full attention while at work to the duties of their position and in doing so acting with responsibility, good judgement and in good faith;
- carrying out any reasonable instructions given by those with authority to do so;
- not divulging to any unauthorised person or making personal use of confidential information connected with the School, either intentionally or through negligent behaviour;
- observing the rules, regulations and instructions adopted by the School following appropriate safeguarding procedures;

- participating fully in any investigation into alleged incidents and/or allegations including attending meetings as directed;
- using electronic communications appropriately;
- ensuring that information brought to light as a result of any investigation is treated with discretion;
- carrying out their role consistently with any standards set by their appropriate professional body;
- taking steps to address any unacceptable behaviour;
- treating colleagues and third parties with dignity and respect.

Examples of Low-Level Concerns (in accordance with KCSIE)

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

In addition to the above, the expectations of those employed in management roles are to:
- ensure the standards expected from all employees are role-modelled, monitored and managed effectively; effectively manage all applicable statutory and non-statutory obligations;
- appropriately manage all alleged incidents and/or allegations.

This list is not exhaustive.

Appendix 5

MANAGING ALLEGATIONS/CONCERNS ABOUT INDIVIDUALS WHO WORK WITH CHILDREN

HAS AN ALLEGATION OR CONCERN BEEN MADE ABOUT AN INDIVIDUAL WHO WORKS OR UNDERTAKES A VOLUNTARY ROLE WITH CHILDREN

YES ↓

MATTER CAN BE DEALT WITH INTERNALLY BY THE ORGANISATION/ AGENCY RESPONSIBLE FOR THE INDIVIDUAL
* Perhaps through an internal disciplinary investigation.
* When a disciplinary investigation is not required, other appropriate action to deal with the matter should be taken **within 3 working days**

NO ←

NO ←

CONTACT THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO) ON PLYMOUTH 307144 FOR ADVICE.

IF THE LADO IS NOT AVAILABLE CONTACT THE PLYMOUTH MULTI AGENCY HUB ON 01752 668000.

NOT SURE ←

DOES THE ALLEGATION OR CONCERN MEET ONE OR MORE OF THE FOLLOWING CRITERIA:
* has the person behaved in a way that has harmed a child, or may have harmed a child?
* has the person possibly committed a criminal offence against or related to a child?
* has the person behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children?
* are there concerns about the person's behaviour towards their own children?
* the allegation/concern is about abuse that took place some time/years ago and the individual may still be working with or has contact with children.

YES ↓

IS THE CHILD AT RISK OF "SIGNIFICANT HARM"?
or
DOES THE CHILD APPEAR TO HAVE BEEN HARMED IN ANYWAY (eg cuts, bruises, scratches, swellings, broken bones etc. Please note this is not a definitive list of injuries and should be used as a guide only)
or
DOES A CRIMINAL ACT APPEAR TO HAVE BEEN COMMITTED (eg a push, pull, shove or hold may be technically a criminal offence in the eyes of the law)?

NO / **YES**

CONTACT THE LADO **WITHIN 1 WORKING DAY** OF THE CONCERN/ALLEGATION BEING MADE KNOWN.

For concerns out of hours i.e. evenings after 5 pm and weekends (including Bank Holidays) when the LADO is not available, contact should be made with the Out of Hours Service on Plymouth 346984

CONTACT THE PLYMOUTH MULTI AGENCY HUB IMMEDIATELY ON PLYMOUTH 668000 (OUT OF HOURS TELEPHONE 346984)

If you are unable to make contact with the Plymouth Multi Agency Hub or Out of Hours, you should contact the Police Local Safeguarding Team on Plymouth 487590.

Social Care colleagues and/or the Police will consider making an immediate visit to the child to assess the injury and/or threat of harm, in order to preserve evidence and ensure the ongoing/immediate safety and wellbeing of the child.

All cases of allegations or serious concerns about adults who work with children referred directly to Social Care or the Police, must also be notified to the LADO by the said referring agency, **within 1 working day** of the allegation/concern being made known.

Similarly the relevant Social Care Team Manager and / or the police force's designated manager should also make contact with the LADO, within the timeframe, to ensure that they have been notified of the allegation / concern.

NO FURTHER ACTION REQUIRED WITHIN PROCEDURES ←

DISCUSSION WITH LADO

Discussions with the LADO will establish whether the allegation/concern has or may have some foundation and should, therefore, be dealt with under the Managing Allegations/Concerns Procedures

DISCUSSION WITH LADO

Discussions between the LADO, Social Care and/or the Police to confirm actions to date and the Managing Allegations/Concerns Procedures have been initiated.

MANAGING ALLEGATIONS/CONCERNS PROCEDURE INITIATED

STRATEGY MEETING called by the LADO. Wherever possible the Strategy Meeting should be arranged **within 5 working days** of the allegation/concern being made known.

Strategy Meeting attended by:
LADO (Chair), Social Care, Police, Employing or Engaging Agency / Organisation and any other relevant party identified by the chair of the meeting.
Strategy Meeting not attended by:
The alleged victim or accused person.

OUTCOME OF STRATEGY MEETING

ROUTE A
NO FURTHER ACTION REQUIRED IN THE MULTI AGENCY ARENA

ROUTE B
NO CHILD PROTECTION CONCERN BUT THE EMPLOYING OR ENGAGING AGENCY TO DEAL WITH SPECIFIC ACTIONS AGREED AT THE STRATEGY MEETING. THIS MAY INCLUDE INTERNAL DISCIPLINARY ACTION

ROUTE C
ASSESSMENT BY SOCIAL CARE UNDER SECTION 17 OF THE CHILDREN ACT 1989 TO DETERMINE IF THE CHILD REQUIRES SERVICES AS A "CHILD IN NEED"

ROUTE D
SECTION 47 INVESTIGATION WHERE THE CHILD IS AT RISK OF SIGNIFICANT HARM OR IS LIKELY TO BE AT RISK OF SIGNIFICANT HARM.

ROUTE E
INVESTIGATION BY THE POLICE ONLY, IN RESPECT OF A POSSIBLE CRIMINAL OFFENCE.

MAY LINK TOGETHER

MAY LINK TOGETHER

POSSIBLE FURTHER STRATEGY REVIEW MEETING

All outcomes of actions agreed at any of the above meetings must be reported to the LADO

HM Government

The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The General Data Protection Regulation (GDPR) and Data Protection Act 2018

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 introduce new elements to the data protection regime, superseding the Data Protection Act 1998. Practitioners must have due regard to the relevant data protection principles which allow them to share personal information,
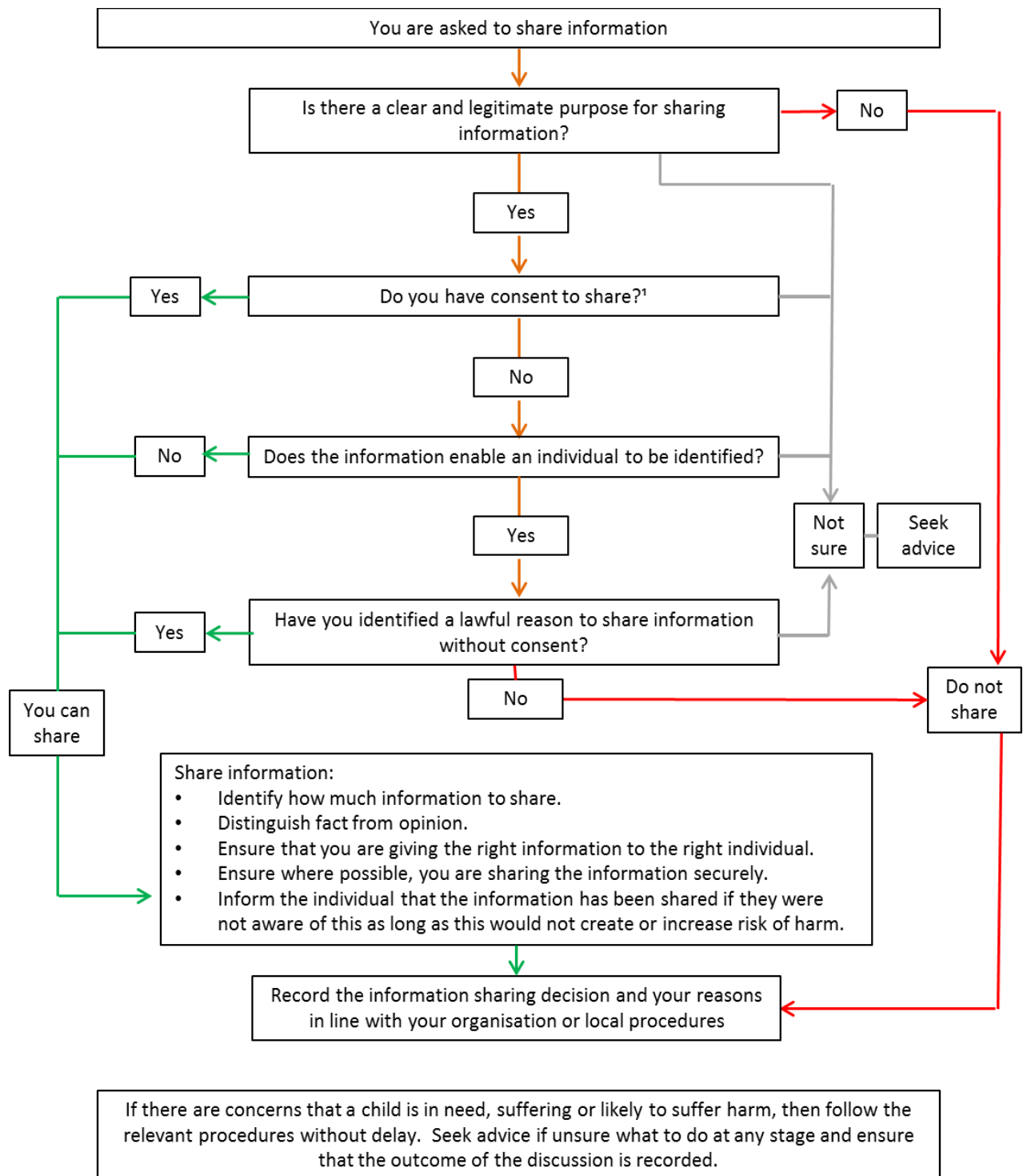
The GDPR and Data Protection Act 2018 place greater significance on organisations being transparent and accountable in relation to their use of data. All organisations handling personal data need to have comprehensive and proportionate arrangements for collecting, storing, and sharing information.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

To effectively share information:

- all practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal

- where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information **without consent**

- information **can be shared legally without consent**, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.

- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

Flowchart of when and how to share information

You are asked to share information

Is there a clear and legitimate purpose for sharing information? → No

Yes

Do you have consent to share?[1] → Yes

No

Does the information enable an individual to be identified? → No

Yes

Have you identified a lawful reason to share information without consent? → Yes

No

Not sure — Seek advice

You can share

Do not share

Share information:
- Identify how much information to share.
- Distinguish fact from opinion.
- Ensure that you are giving the right information to the right individual.
- Ensure where possible, you are sharing the information securely.
- Inform the individual that the information has been shared if they were not aware of this as long as this would not create or increase risk of harm.

Record the information sharing decision and your reasons in line with your organisation or local procedures

If there are concerns that a child is in need, suffering or likely to suffer harm, then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

1. Consent must be unambiguous, freely given and may be withdrawn at any time

Myth-busting guide

Sharing of information between practitioners and organisations is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect. Below are common myths that can act as a barrier to sharing information effectively:

The GDPR and Data Protection Act 2018 are barriers to sharing information

No – the GDPR and Data Protection Act 2018 do not prohibit the collection and sharing of personal information. They provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them. Never assume sharing is prohibited – it is essential to consider this balance in every case. You should always keep a record of what you have shared.

Consent is always needed to share personal information

No – you do not necessarily need the consent of the information subject to share their personal information.

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given.

There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk.

Where a decision to share information without consent is made, a record of what has been shared should be kept.

Personal information collected by one organisation cannot be disclosed to another organisation

No - this is not the case, unless the information is to be used for a purpose incompatible with the purpose it was originally collected for. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.

Practitioners looking to share information should consider which processing condition in the Data Protection Act 2018 is most appropriate for use in the particular circumstances of the case. This may be the safeguarding processing condition or another relevant provision.

DHSG PREVENT Risk
Assessment

PREVENT OBJECTIVE 1: Clear leadership and accountable structures are in place and visible throughout the organisation

PREVENT OBJECTIVE 2: Staff and the Governing Body have been appropriately trained according to their role

PREVENT OBJECTIVE 3: An appropriate reporting and referral process is in place and referrals are being managed effectively

PREVENT OBJECTIVE 4: A broad and balanced curriculum that helps protect students against extremism and promotes community cohesion

Obj	Prevent Vulnerability/Risk Area	Action taken/already in place to mitigate/address risk	Last Reviewed	RAG

1	**LEADERSHIP**
	Do the following people have a good understanding of their own and educational responsibilities in relation to the "Prevent Duty"?
	
	  ■ DSL
	  ■ Board of Trustees
	  ■ SLT
	  ■ Staff
		■ The DSL has delivered whole staff training and briefings for Trustees ensuring school procedures and policy is clear to all with regard to schools systems for PREVENT.	June 2023	G

		■ All staff have completed the online awareness training and certificates are kept by the DSL. Trustee certificates are held by the Clerk.	June 2023	G
		■ School policies have been updated to reflect PREVENT and have been adopted by Trustees, a range of policies reflecting PREVENT are on the website.	June 2023	G
		■ The DSL has completed WRAP training	Nov 2015	G
		■ The DSL has attended the LA PREVENT in schools briefing.	Feb 2015	G
		■ DSL has completed Home Office only PREVENT Training March 2023.		G
		■	April 2018	
		■ The DSL attended Project Argus anti-terrorism workshop (managing incidents)		G

2	**Partnership**			
	Is there active engagement from the school Trustees, SLT and other leaders?	▮ The PREVENT Lead (SPOC) for DHSG is the DSL Mrs R Morgan.	June 2023	G
		▮ The PREVENT Lead is familiar with the Local Authority CHANEL process and Leads.	June 2023	G
	Does the school/setting have an identified single point of contact (SPOC) in relation to Prevent?	▮ The PREVENT Lead is part of the secondary phase Inclusion group. The Head Teacher is a member of the Plymouth Learning Trust (PLT) Inclusion Group.	June 2023	G
	Does the school/setting engage with the Local Authority Police Prevent Leads and engage with local Prevent Boards/Steering Groups at Strategic and Operational level?	▮ PREVENT themes are reflected in the School Development Plan (SDP)	June 2023	G

| 3 | **Staff Training**
Do all staff have sufficient knowledge and confidence to:

Exemplify British Values in their leadership, teaching and through general behaviours in the school

Understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism

Have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response | ■ DHSG takes diversity and equality very seriously. For example, we share British Values in our Personal, Social, Health and Economic Education (PSHEE) programme and subject based curriculum and assemblies. We celebrate diversity through our focus on internationalism and support to world charities and Amnesty International. We model tolerance and respect for all groups in all communications and all areas of school life, celebrating diversity both as a reflection of the local community and also as a national awareness of our diversity as a country.
■ DHSG has an Equality Policy in place reflecting these values.
■ As a direct result of the depth and breadth of the training for PREVENT developed and delivered by the DSL, all staff and Trustees are aware of the factors that make an individual vulnerable and have a better awareness of 'push and pull' factors for radicalisation and extremism.
■ PREVENT is safeguarding, and in the same way that we have always taken our safeguarding duties, staff are aware of the need to refer concerns accordingly. The DSL is also fully aware of the actions to take and who to contact in the event of a concern. | Ongoing

Ongoing
June 2023
June 2023

June 2020 | G

G
G

G |
| 4 | **Welfare and pastoral support**
Are there adequate arrangements and resources in place to provide pastoral care and support as required by the school?

Are there adequate monitoring arrangements to ensure that this support is effective and supports the school's welfare and equality policies?

Does the pastoral support reflect the student demographic and need? | ■ DHSG has robust pastoral provision with a supportive House system. The Pastoral programme ensures that British Values and critical thinking skills are promoted. These are underpinned by the SEND, Behaviour for Learning and Anti-Bullying policies and supported by the SLT and SENCO. This works effectively, supporting students and families in an open, honest and supportive culture.
■ A clear system of referral to our Assistant Head Teacher for Inclusion and Student Support Team is in place to help to ensure no issues of vulnerability are missed.
■ DHSG has a proven track record of working with families and other agencies such as Children's Social Care, Harbour, PDAS, Barnardos and The Zone in order to improve outcomes for our students. | June 2022

Ongoing

Ongoing | G

G

G |

| 5 | **Safety Online**

Does the school have a policy relating to the use of IT and does it contain a specific reference and inclusion of the Prevent Duty?

Does the school employ filtering/firewall system to prevent staff/students/visitors from accessing extremist websites and material?

Does this also include the use of using their own devices via Wi-Fi? | ■ The e safety policy contains specific reference to the PREVENT duty. This policy includes the use of students own devices via wifi.
■ DHSG has a robust firewall and filter programme via SWGFL that is managed by the Network Manager.
■ SWGFL has updated it's filter capabilities to directly alert the Police where extremist content is searched for. In addition, we have installed Net Support DNA which reports any key words that are searched of concern. This information is then passed to HoH or the DSL if there are safeguarding concerns.
■ DHSG has a clear Acceptable Use Policy that has been updated to reflect PREVENT and is signed by all staff and students. | June 2023

June 2023

June 2023

July 2023 | G

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6	**Site Security**			
	Are there effective arrangements in place to manage access to the site by visitors?	🔴 Safeguarding policy and practice are robust and monitored by the DSL and Safeguarding Trustee.	June 2023	G
	Is there a policy regarding the wearing of ID on site? Is it enforced?	🔴 All staff, Trustees and visitors to school are issued with lanyards that clearly denote who they are and those with no DBS red badged and accompanied. All visitors are asked to show ID and sign in at reception, where they are also provided with safeguarding information.	Ongoing	G
		🔴 All Sixth Form students and those from The Link Partnership are issued badges to support identification and site security.	Ongoing	G
	Are dangerous substances kept and stored on site?	🔴 Dangerous substances involved with cleaning are stored in locked cupboards and all substances are used and stored in line with COSHH regulations.	June 2023	G
		🔴 All materials sent on behalf of the school are vetted in advance by SLT.	Ongoing	G
	Is there a procedure covering the distribution (including electronic) of leaflets or other publicising material?	🔴 All offsite activities are thoroughly risk assessed.	June 2023	G
		🔴 Our offsite procedures have been updated to reflect due diligence to PREVENT as part of the trip submission process.	June 2023	G
	Does the school/setting intervene where off site activities are identified or are likely to impact upon staff and/or students i.e. leafleting, protest etc?	🔴 It is Policy to demonstrate due diligence in regard to PREVENT with any person being in contact with our students. This is reflected in our staff Code of Conduct.	June 2023	G
		🔴 Our lettings Policy has been updated to reflect due diligence in relation to PREVENT.	June 2023	G
				G

7	**Safeguarding** Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies? Do Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism?	▮ Safeguarding and Child Protection policy reflects PREVENT and is also reflected across a suite of policies. ▮ All staff receive annual and periodic safeguarding training as required through the year. A safeguarding actions log is kept by the DSL. ▮ The DSL attends regular updates and attends networking meetings to share good practice.	June 2023 Ongoing Ongoing	G G G
8	**Communications** Is the school's Prevent Lead and their role widely known across the school? Are staff and students made aware of the Prevent Duty, current risks and appropriate activities in this area? Are there information sharing protocols in place to facilitate information sharing with Prevent partners?	▮ All staff, Trustees, parents/carers and students are informed who the DSL is via the Student Planner/Website/Training/Posters etc ▮ Staff have completed the PREVENT awareness online module and been certificated. ▮ Trustees have received PREVENT awareness training and have completed the online module and been certificated. ▮ The DSL is aware of who to share information with in terms of PREVENT. ▮ Our Safeguarding and Child Protection Policy provides clarity on information sharing. ▮ We can access the local information report "light" which provides some information.	June 2023 June 2023 June 2023 June 2023 June 2023 June 2023	G G G G G G G

| 9 | **Incident Management**

Does the school have a critical incident management plan which is capable of dealing with terrorist related issues?

Is a suitably trained and informed person identified to lead on the response to such an incident?

Does the Communications/Media dep't understand the nature of such an incident and the response that may be required?

Does the school have effective arrangements in place to identify and respond to tensions on or off site which might impact upon staff, students and/or public safety?

Are effective arrangements in place to ensure that staff and students are appraised of tensions and provide advice where appropriate? | ▮ The school has a critical incident management procedure. This is detailed in the Major Incident Policy in school.

▮ The Head Teacher would be expected to lead in the case of an incident. DHT and key members of SLT are also aware of what process to use in the event of needing to implement this policy. (DHT to lead in Head Teacher absence)

▮ The Head Teacher would work with our service level agreement providers in terms of publicised responses.

▮ SLT have discussed the Project Argus workshop recommendations which have fed into the critical incident management procedures. | June 2023

June 2023

Ongoing

June 2022 | G

G

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G |

10	**Staff and Volunteers** Does awareness training extend to sub-contracted staff and volunteers? Is the school vigilant to the radicalisation of staff by sub-contracted staff and volunteers?	▪ All staff are subject to rigorous, ongoing safeguarding checks including annual Safeguarding declarations as well as checks in line with Safer Recruitment Policy and Procedures. ▪ All Volunteers are subject to safeguarding strategies in line with appropriate legislation. No Volunteer is left alone with students without a DBS check.	June 2023 June 2023	G G
11	**Curriculum** Does the school have a range of initiatives and activities that promote the spiritual, moral, social and emotional needs of children aimed at protecting them from radicalisation and extremism influences? Does the school deliver training that helps develop critical thinking skills around the power of influence, particularly on-line and through social media? Does the school ensure that Students are aware of the benefits of community cohesion and the damaging effects of extremism on community relations? Are Staff able to provide appropriate challenge to students, parents/carers and Trustees if opinions are expressed that are contrary to fundamental British values and promotion of community cohesion?	▪ DHSG has a range of initiatives and activities that promote the spiritual, moral, social and emotional needs of students through both the explicit curriculum (PHSEE and Curriculum subject) and the 'hidden' ones, assembly, Enrichment days, visitors, display, newsletters, PTFA, Social Media and community outreach work. ▪ DHSG actively promotes community cohesion and works closely with all stakeholders bringing the community together. This is evidenced well through our focus on Internationalism. ▪ The Head Teacher, with the full backing of the Trustees, provides appropriate guidance and challenge to parents/carers, staff and students who express racist, extremist, homophobic, or other views/opinions contrary to the inclusive values promoted by the school. These are instilled in the curriculum and the ethos of the school. They are monitored by Ofsted through its inspections. ▪ Our Equalities and Community Cohesion Policy is clear and robust in it's inclusivity message as is our published Mission Statement and Ethos.	Ongoing Ongoing Ongoing June 2023	G G G G

Devonport High School for Girls Student Acceptable Use Agreement

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access to these digital technologies.

This acceptable use Agreement is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
  - that students will have good access to digital technologies to enhance their learning and will, in return, expect the students to agree to be responsible users.

Acceptable Use Agreement

I understand that I must use school digital technologies in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users.

For my own personal safety:

- I understand that I am only allowed to access the internet via the school's secure Wi-Fi connection.
- I understand that the school will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not disclose or share personal information about myself or others when on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc.)
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online (including on my own device whilst at school).

I understand that everyone has equal rights to use technology as a resource and:

- I understand that the school systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the school systems or devices for on-line gaming, on-line gambling, internet shopping, file sharing, or video broadcasting (e.g., YouTube). Any exception to this would require the permission of a member of staff.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

I recognise that the School has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the School:

- I will only use my own personal devices (mobile phones/USB devices etc.) in school if I have permission as indicated in the Mobile Devices Policy. I understand that, if I do use my own devices in the school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment.
- I understand the risks and will not try to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programs or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.

- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programs)
- I will not install or attempt to install or store programs of any type on any school device, nor will I try to alter computer settings.
- I must not create, access, transmit or download inappropriate or extremist materials, as defined within the Prevent Guidance (2015), using the school's systems or network. The school has a statutory duty to take steps to prevent individuals being drawn into extremism and terrorism, and a duty to alert and report any attempted access to, or dissemination of, such inappropriate material.
- I will not use social media sites without explicit permission from a member of staff whilst on the school site.

When using the internet for research or recreation, I recognise that:

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not try to download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

I understand that I am responsible for my actions, both in and out of school:

- I understand that the school also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be cyber-bullying, use of images or personal information, posting or liking posts which refer to the school, staff or students in a way that might cause offense on social media or other web-based platforms).
- I understand that if I fail to comply with this Acceptable Use Agreement, I will be subject to disciplinary action. This may include loss of access to the school network/internet, detentions, suspensions, contact with parents/carers and in the event of illegal activities involvement of the police.

Please complete the sections on the next page to show that you have read, understood and agree to the rules included in the acceptable use agreement. If you do not sign and return this agreement, access will not be granted to school systems and devices.

Student   Acceptable Use Agreement Form

This form relates to the student acceptable use agreement, to which it is attached.
Please complete the sections below to show that you have read, understood and agree to the rules included in the acceptable use agreement. If you do not sign and return this agreement, access will not be granted to l school digital systems.

I have read and understand the above and agree to follow these guidelines when:
- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, USB devices, smartwatches, cameras etc.
- I use my own equipment out of the school in a way that is related to me being a member of this School e.g. communicating with other members of the school, accessing school email, VLE, website etc.

Name of Student		Tutor Group	
Signed		Date	

Parent/Carer Counter signature

Signed		Date	
Name of Parent/ Carer			

Your Responsibility for Reporting Low Level Concerns

[Keeping children safe in education](#) was updated in 2021 to include a statutory requirement to report all low-level concerns regarding employees, volunteers and contractors.

What is a low-level concern?

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not serious enough for the school or college to refer to the local authority.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

If you have a concern you <u>must</u>:

- speak to your Head Teacher, the DSL(or another member of SLT in their absence) and
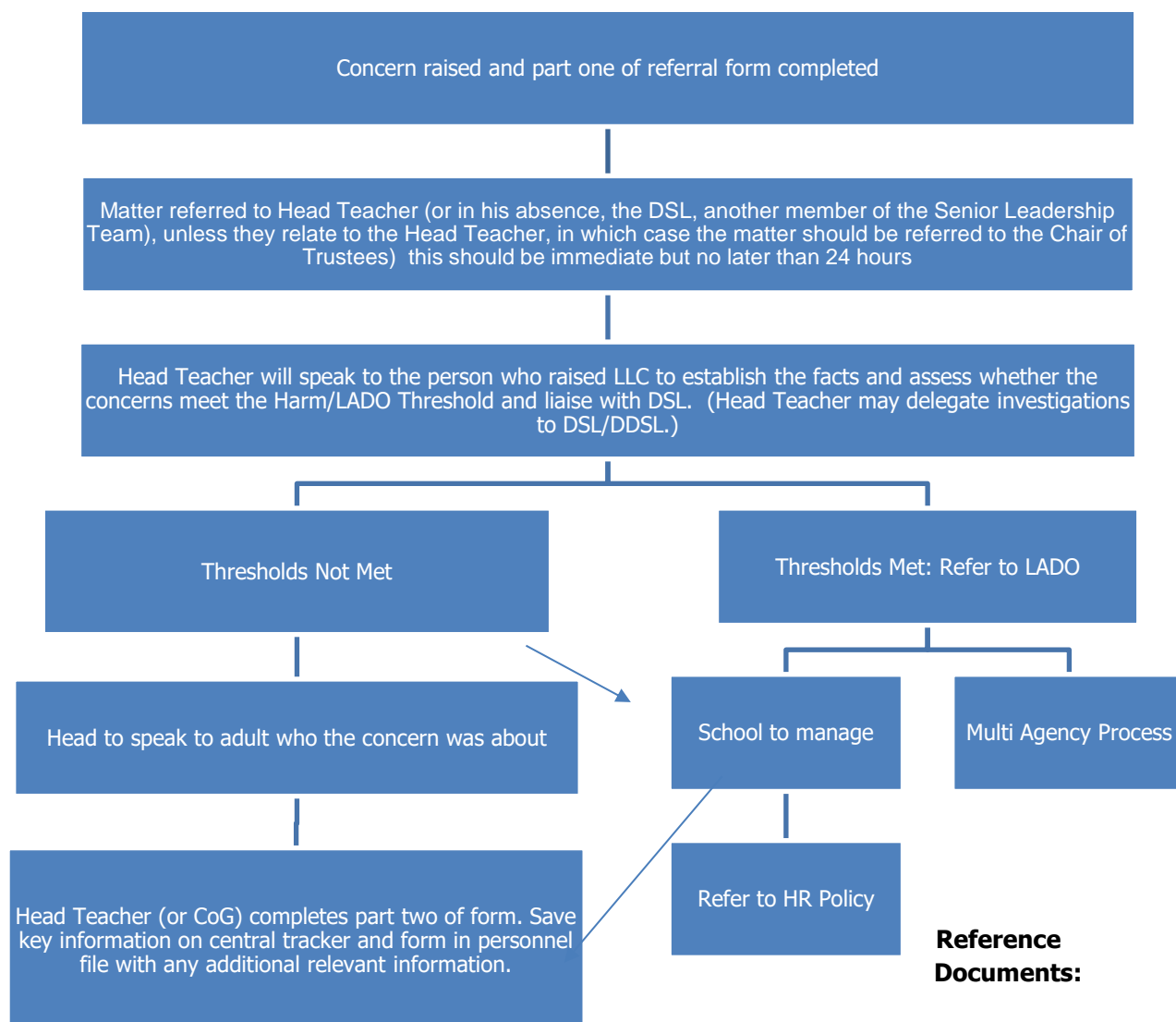- complete part one of the attached referral form.

  If someone talks to you about a concern you <u>must</u> direct them to do the same thing.

If the concern is about the Head Teacher the form must be referred to the Chair of Trustees.

Low Level Concern Process

If a member of staff has what they believe to be a Low-Level Concern, they should complete Part One of the Referral Form sending this to the Head Teacher without any delay (in the absence of the Head Teacher, the DSL or another senior leader. If the concern is in relation to the Head Teacher the form should be sent to the Chair of Trustees.

All members of staff should direct others to make their own referral to the Head Teacher and follow up to ensure this was completed.

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┌─────────────────────────────────────────────────────────────────┐
│        Concern raised and part one of referral form completed     │
└─────────────────────────────────────────────────────────────────┘
                                │
┌─────────────────────────────────────────────────────────────────┐
│ Matter referred to Head Teacher (or in his absence, the DSL,      │
│ another member of the Senior Leadership Team), unless they relate │
│ to the Head Teacher, in which case the matter should be referred  │
│ to the Chair of Trustees)  this should be immediate but no later  │
│ than 24 hours                                                     │
└─────────────────────────────────────────────────────────────────┘
                                │
┌─────────────────────────────────────────────────────────────────┐
│ Head Teacher will speak to the person who raised LLC to establish │
│ the facts and assess whether the concerns meet the Harm/LADO      │
│ Threshold and liaise with DSL. (Head Teacher may delegate         │
│ investigations to DSL/DDSL.)                                      │
└─────────────────────────────────────────────────────────────────┘
            │                                    │
┌────────────────────────┐          ┌────────────────────────────────┐
│   Thresholds Not Met    │          │  Thresholds Met: Refer to LADO  │
└────────────────────────┘          └────────────────────────────────┘
            │                              │                  │
┌────────────────────────┐      ┌──────────────────┐  ┌──────────────────┐
│ Head to speak to adult  │      │ School to manage  │  │ Multi Agency      │
│ who the concern was about│     └──────────────────┘  │ Process           │
└────────────────────────┘               │             └──────────────────┘
            │                    ┌──────────────────┐
┌────────────────────────┐      │ Refer to HR Policy│
│ Head Teacher (or CoG)   │      └──────────────────┘
│ completes part two of   │
│ form. Save key          │
│ information on central  │
│ tracker and form in     │
│ personnel file with any │
│ additional relevant     │
│ information.            │
└────────────────────────┘
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Reference Documents:

1. KCSIE – Part 4 (Part four: Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors)
2. Employee Guidance on Low Level Concerns
3. Low Level Concern Referral Form
4. DHSG Code of Conduct
5. DHSG Safeguarding and Child Protection Policy
6. DHSG Disciplinary Policy

Raising concerns about adults working in school

Please use this form to share any concern, no matter how small, and even if no more than a 'nagging doubt that an adult working in or on behalf of DHSG may have acted in a manner which:

- Is not consistent with DHSG Code of Conduct and/or
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

This form is completed in line with DHSG's Safeguarding and Child Protection Policy and Keeping Children Safe in Education.

This form and any follow-up information will be stored securely within the school's systems, with access only by relevant personnel. This will be stored in accordance with the school's GDPR and data protection policies. The referrer must keep the information confidential and not share the concern with others apart from the Head Teacher (or in his absence, the DSL or another member of the Senior Leadership Team).

You must keep the information confidential and not share the concern with others apart from the Head Teacher or where this is related to the Head Teacher, the Chair of Trustees.

| Part One – To be completed by the referrer	
Name of Referrer	
Referrers Job Title	
Name of the individual about whom the concern is being raised and their role	
Today's date	
Details of concern	

You should provide a concise record, including brief context in which the concern arose, and details which are chronological, and as precise and accurate as possible, of any such concern and relevant incident(s) (please use an additional sheet if necessary).

Now send this form to the Head Teacher (or in his absence, the DSL or another member of the Senior Leadership Team / or if the concern is in relation to the Head Teacher, the Chair of Trustees)

Part Two: To be completed by the Head Teacher			
Date and Time of Referral			
Action Taken			

Include a concise chronological record which includes information on who was involved at each stage of managing this referral and whether this was referred to another process.

Name and Signature		Date	

Devonport High School for Girls
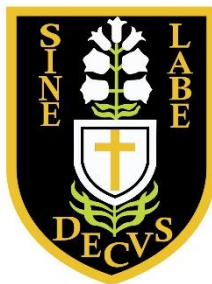
CPOMS Protocol

All safeguarding concerns must be discussed in person with the DSL or DDSL immediately without delay. A CPOMS record may be requested by the DSL or DDSL following the discussion and this must be completed on the same day.

What is CPOMS?

CPOMS (Child Protection Online Management System) is a secure online system which allows staff to report information or concerns about a student. This information can then be shared with the people who need to know allowing the appropriate action to be taken. The system means that all the information logged by a variety of staff about a particular student is kept together. Chronologies can be produced quickly allowing patterns to be spotted and support to be put in place. Documents such as: minutes of meetings; Child Protection plans; Education Health and Care Plans; Annual reviews and reports from outside agencies can also be uploaded into the student's online document vault. This allows those with access, specifically the DSL/DDSL to access information on any student in the school. It also makes it easy to electronically transfer information securely between schools at transition points.

1. Information Sharing

Under Data Protection Legislation, all personal information kept in school must be treated sensitively, in a lawful, fair and transparent manner, should only be kept for as long as is absolutely necessary, should be accurate and should be stored in a confidential, secure manner. There must be a lawful reason to share information. Section 5.4 of the IPMAT Data Protection Policy states-

Staff are responsible for:
- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address

- Contacting the DPO in the following circumstances:

1. With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
2. If they have any concerns that this policy is not being followed
3. If they are unsure whether or not they have a lawful basis to use personal data in a particular way
4. If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
5. If there has been a data breach
6. Whenever they are engaging in a new activity that may affect the privacy rights of individuals
7. If they need help with any contracts or sharing personal data with third parties

However, with regard to safeguarding children from harm, we recognise the key messages given in Keeping Children Safe in Education 2023. We know that information sharing is vital in identifying and tackling all forms of abuse and neglect and recognise that Data Protection Legislation does not prevent us from recording and sharing information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of students. We recognise that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information'.

This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a student at risk.

When students leave school, safeguarding will be transferred to the new school, along with other information we are obliged to pass on to comply with the DFE, and information necessary to protect the vital interests of an individual.

All information shared with a student's new school will be sent securely and a receipt will be required which will be kept in both the sending and receiving school. Safeguarding records are retained for a student until their 25th birthday. (It is recommended that in the situation of electronic transfer, an email is sent to the receiver asking for confirmation that the number of files sent have been received. The receipt will then be the reply by return of email and should be stored securely).

CPOMS may be used for:
- Reporting a safeguarding concern (all staff)
- Recording the follow up actions for safeguarding concerns (DSL/DDSL)
- SEND Chronologies (SENCO only)

2. **Who can view and input information on CPOMS?**

Information will always be shared on a need to know basis. This may mean there will be times when you have submitted information, but are not provided with specific details of outcomes.

Who has access:
- The DSL, DDSL and Head Teacher are able to view all information and input information for all sections.
- The SENCO will have access to all information held within CPOMS for SEND students only.
- For all other staff, access is restricted to adding incidents to CPOMs only

3. How do I log in to CPOMS?

• Every member of staff will receive an email invitation to login to CPOMS and create and individual password. The Administrator (DSL) will add staff emails onto the system and this will generate the invitation.

• To get to the initial login screen follow the link in the email or go to: https://dhsg.cpoms.net
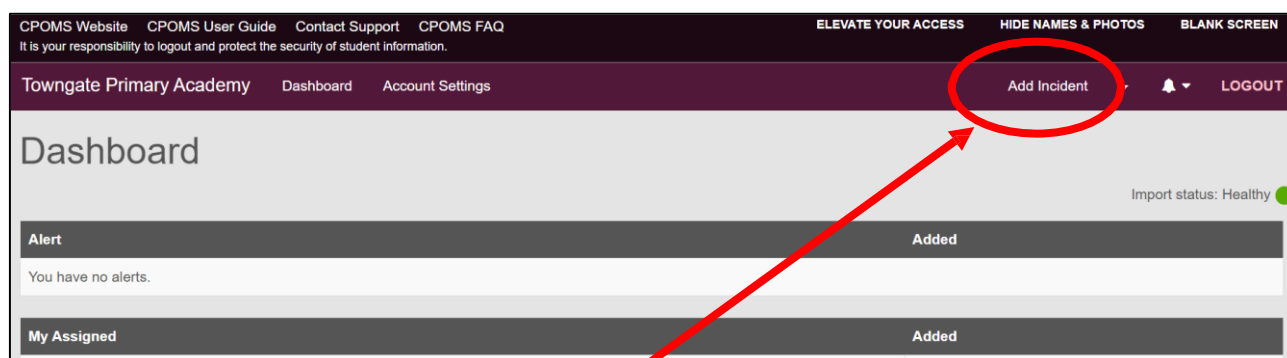Save the link to CPOMS on your device to allow for swift logging to take place.

• The login screen looks like this:
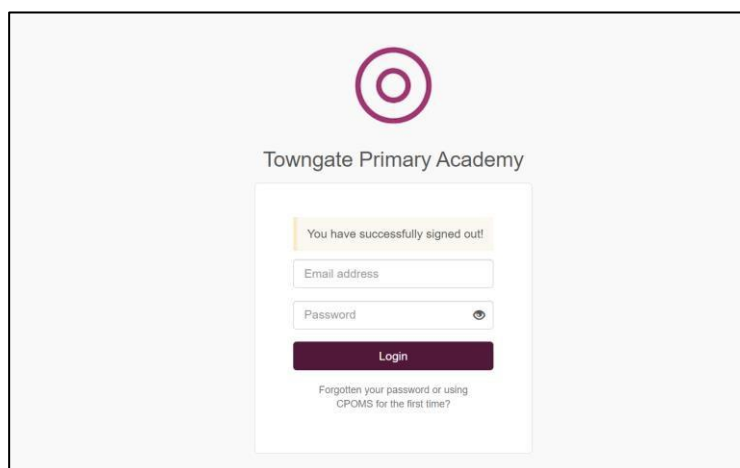
If you are a new user and don't have a password then click straight on the 'forgotten your password……' message and set up a new password. After that you will be able to log in directly from this screen.

• The CPOMS screen will look like this:

4. How do I log an incident?

a) Click on **Add Incident** in the purple banner at the top of the initial screen.

b) Enter the **Student's** name in the student box it will show options from Integris as you type.
PLEASE ENSURE YOU SELECT THE CORRECT NAME

c) Enter your concern in the **Incident** box.

Guidelines for recording an incident on CPOMS
Write a **_succinct_** and **_factual_** account of the incident/observation
Remember, **anything you write on CPOMS could be subject to freedom of information** and could, therefore, be seen by parents/carers, courts or serious case reviews

Do not express your opinion as these records could be used as evidence. Do not add multiple exclamation marks or write in capital letters when making your entry even though you may feel frustrated. Below are examples of your opinion rather than facts:

- Really angry
- Threatening
- Rude
- Stormed off
- Aggressive
- As per usual,….
- Surprisingly … (avoid adverbs such as this)

The repetition of such incidents is becoming frustrating for staff and other students … (be careful not to express you own emotions regarding the situation. If CPOMs is called as official evidence, it will be very unhelpful.)

Remain factual
- The parent spoke loudly in close proximity to my face (approx. 15cm)
- The parent paced the room. Their fists were clenched. They would not respond to the invitation to sit down. The student was tearful. They struggled to speak whilst crying. They repeatedly asked if I could not tell anyone (approx. 6 times). Their emotions and language suggested to me they were distressed.
- Ensure that you use the language used in the incident – from both student and/or adults.

Ensure you link any students into your incident log by typing their name in the 'linked students' text box. Please use student's initials when they have been linked if you are including them in the incident log.

- Use initials when recording logs if you are including other students into your logs, but ensure that you are linking these students.
- Add job roles / parent/carer roles in brackets to ensure your logs are clear.

Be careful to be accurate and specific as once you submit the incident **you cannot delete it**. Whilst the incident can be edited, this is time-stamped and shows as an edit on the system.

- Incidents must be added on the same day following discussion with the DSL/DDSL
- Most incidents will require an action. If you have already taken action, make sure you record this as part of the incident. If there are any additional actions following DSL/DDSL input these must also be recorded as part of the log and notify you for additional detail.

- The person who has the concern or observation must be the person who records the incident; it cannot be passed on to another person.

Categories: Every incident must be linked to a category. Select a category which you feel best describes your concern.

Linked Student(s): Incidents where multiple students are involved or siblings.

Body Map – Please complete if applicable**.**

Date/Time: Record the date and time of the incident itself.

Alert Staff Members: Each staff 'group' is represented by the buttons, clicking a button will mean that **everyone** in that group will be alerted and be able to read the Incident. To alert specific individuals start to type the name and options will appear.

Who to Alert / Pre-set Alerts: The DSL should be alerted to all incident logs.

File(s): The option to upload documents is available here *e.g. previous school notes, letter from social services (generally this will only be used by the DSL/DDSL or SENCO.* Before uploading a file, it is important to raise an incident simply stating the name of the file you intend to upload. This will ensure the document in correctly listed in the student's chronology.

Agencies: Select from the list of agencies pre-populated in the system if appropriate.

Add Incident: Click to submit the incident and alert members of staff - remember **YOU CANNOT EDIT THE INCIDENT ONCE IT IS SUBMITTED**. If you make a significant mistake and realise after it is submitted, take note of the incident ID number (top left corner of the incident) and let the DSL know. Once you have finished adding the incident please remember to log out.

5. How will I know if I have an alert?
- As soon as somebody alerts you to an incident you will receive an email. If you click on the link in the email it will take you directly to the login screen where you can enter your password and read the alert.
- If you have received several alerts you can read all the incidents at the same time. You can do this via the dashboard or use the 'see next' alert button
- If the incident does not require an action from you then you can click on the 'mark as read' tab. The incident will then disappear.
- If you need to act on the information, e.g. speak to the student or the parent/carer, then don't click on the 'mark as read' tab until you have completed the action and written a summary of the outcome in the 'Action' box. This can then be shared with the people who need to know what has happened. You can then click on the 'mark as read' tab.
- Sometimes the school will need to obtain consent from parents/carers to share information. This will need to be recorded in the action box.
- It is better to keep the actions associated with an incident attached to that incident rather than creating a new incident.

Elevated Access

- The DSL/DDSL and the Head Teacher team have elevated access.
- Elevated Access allows you to search for a specific student. It is possible to access contact information, current attendance figures, review incidents and download documents from the student's vault.
- Further actions can be added to logged incidents if required.

6. CONFIDENTIALITY

- Much of the information shared on CPOMS is extremely confidential. It should only be shared with people who need to know. If you are having a professional discussion about it with a colleague make sure that there are no students or other adults in earshot.
- **You must ensure that you don't leave CPOMS open on your desktop**.
- Remember to use the lock screen if you walk away and leave your laptop unattended as per your GDPR duties.
- You must never download documents onto a personal device (phone, tablet or computer).
- You must never forward information to a personal email account.
- Any scanned documents to be added must be uploaded to a secure folder. Scans should be immediately deleted from computers once the document is uploaded to CPOMS, including from the recycle bin.

7. Transfer: CPOMS will be one of the school's key sources for passing information to a new school both in year and at the point of school transfer. When we transfer information it is vital that we follow Data Protection Legislation procedures, remembering that the information passed must only be that required by law (name, DOB, attendance etc), child protection information, or information that will support the student's wellbeing where concerns have been raised about this.