

# Child Protection, Adult Protection & Safeguarding Policy and Procedure – Grafham Grange School

**The OHC&AT Board of Directors has agreed this Policy – 16<sup>th</sup> March 2018.**

Jay Mercer  
Chair of OHCAT Board



Darren Coghlan  
Chair of OHC Board



# Child Protection, Adult Protection & Safeguarding Policy and Procedure– Grafham Grange School

## KEY SAFEGUARDING CONTACTS

Designated Safeguarding Lead	<b>Stephen Mitchell</b> <a href="mailto:s.mitchell@grafham-grange.co.uk">s.mitchell@grafham-grange.co.uk</a>
Designated Safeguarding Team	<b>Sandra Jackson</b> <a href="mailto:s.jackson@grafham-grange.co.uk">s.jackson@grafham-grange.co.uk</a>  <b>Kay Longbottom</b> <a href="mailto:k.longbottom@grafham-grange.co.uk">k.longbottom@grafham-grange.co.uk</a>
Principal	<b>Neil Sykes</b> <a href="mailto:n.sykes@grafham-grange.co.uk">n.sykes@grafham-grange.co.uk</a>
Local Governor with responsibility for Health & Safety, Child Protection & Safeguarding	<b>Jo Yarlett</b> <a href="mailto:jyarlett@sashub.org">jyarlett@sashub.org</a>
Chair of Governors	<b>Ken Cowdery</b> <a href="mailto:KCowdery@sashub.org">KCowdery@sashub.org</a>

Borough LADO	<b>Duty LADO</b> <b>LADO@surreycc.gov.uk</b> <b>0300 123 1650</b>
--------------	---

## CONTENTS

Introduction	1
Definitions	2
Key points	2
Child protection and safeguarding – recognition and response to abuse	5
Safeguarding – providing a safe environment	6
Safeguarding mechanisms	8
<i>Staff training and related requirements</i>	9
<i>Recruitment and disclosure</i>	9
<i>Visitors</i>	10
<i>Working with families</i>	10
Safeguarding procedure	11
<i>Responding to concerns about individual students</i>	11
<i>Contact with the family</i>	12
<i>Recording and reporting</i>	13
<i>Where a criminal offence is suspected</i>	14
<i>Immediate risk or danger</i>	14
<i>Requests for assistance by other agencies</i>	14
<i>Students subject to a Child Protection Plan</i>	15
Managing allegations of abuse against staff	15
<i>Informing the subject of an allegation</i>	16
<i>Suspension</i>	16
<i>Further action</i>	17
Policy review information	18
Related policies and procedures	18
Further information, advice and guidance	18
Appendix 1: Safeguarding and child protection in specific circumstances	20
Appendix 2: Information and guidance for staff	29
Appendix 3: Definitions and categories of abuse	30
Appendix 4: Visitor information	37

## INTRODUCTION

Orchard Hill College and Academy Trust (OHC&AT) is committed to providing outstanding educational opportunities for all our pupils and students. The safety and welfare of our pupils and students is of the utmost importance. All adults working in OHC&AT settings must protect children and vulnerable adults from abuse and be aware that any pupil or student may be abused or at risk of abuse.

This policy is based on 'Keeping Children Safe in Education' (DfE, 2016), and is written with reference to Government guidance and law including the Safeguarding Vulnerable Groups Act (2006), 'Working Together to Safeguard Children' (DfE, revised February 2017), 'Children Missing Education' (DfE, 2016), the Every Child Matters document, the Care Act (2014), the Ofsted guidance document 'Inspecting Safeguarding in Maintained Schools and Academies' (2016), the Ofsted School Inspection Handbook (DfE, 2017) and the Department of Education advice document 'What to do if you're worried a child is being abused' (2015), as well as the Home Office documents Channel Duty Guidance (2015) and PREVENT Duty Guidance (2015). The policy and procedure are also informed by and compliant with Local Safeguarding Children Board's Child Protection Procedures and SCIE guidance on safeguarding of vulnerable adults.

The policy and procedure are reviewed at least annually to ensure that updates to relevant guidance are reflected and enacted across OHC&AT.

This policy was last updated in February 2018 by Jackie Van-West, OHC&AT Director of Safeguarding & Learning Support Services, and John Prior, OHC&AT Deputy CEO/Executive Head, Quality & Development.

This policy includes OHC&AT's procedures for dealing with allegations of abuse against staff (pages 15-17).

The notion and practice of safeguarding underpins diverse aspects of our practice as education providers. A full list is given at the end of this document, but in particular this policy should be considered in conjunction with OHC&AT and Grafham Grange School policies and procedures concerning Positive Behaviour, Anti-Bullying, Anti-Radicalisation, Equality & Diversity, E-Safety, Whistleblowing, Health & Safety, Risk Assessment, Educational Visits, Attendance, Supporting Children in School with Medical Conditions, Relationships & Sex Education, Substance Misuse, Personal & Intimate Care and Missing Child. All policies and procedures are available from the website and/or on request from the school office.

Safeguarding is everyone's responsibility. All adults working with, or on behalf of, OHC&AT pupils and students **must always follow all of our procedures.**

As a family of specialist education providers, OHC&AT recognises that children and young people with SEND are especially vulnerable to abuse. All of our working practices are designed to maximise opportunities for our pupils and students: to learn how to be and keep safe; to communicate and be understood through whichever means of communication is most effective for them; to build healthy and enriching

relationships; to maximise their potential and achieve ambitious goals within their local communities.

Throughout this policy, 'student' is used as a term to denote both children and vulnerable adults.

## DEFINITIONS

OHC&AT adheres to the definition of safeguarding given in Keeping Children Safe in Education (2016), along with the duty to both children and vulnerable adults that it implies:

*“Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.”*

Child protection relates to any child (under 18) who has suffered from, or may be at risk of physical injury, neglect, emotional abuse or sexual abuse.

Safeguarding relates to children, young people and vulnerable adults and means protecting their health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect, including protecting children and young people who are vulnerable or at risk of being radicalised.

## KEY POINTS

All staff must be clear about their own role and that of others in providing a caring and safe environment for all children and vulnerable adults and must know how they should respond to any concerns about an individual student that may arise. Each OHC&AT provision has a Designated Safeguarding Lead (DSL) who has overall responsibility for child protection and safeguarding. Though some of the duties inherent to this role can and will be delegated to the deputy DSL in order that work is completed most efficiently, **the ultimate responsibility remains with the DSL**. In the absence of the DSL, the deputy DSL will undertake the DSL’s duties.

The Designated Safeguarding Lead (DSL) within Grafham Grange School with responsibility for Child Protection is **Steve Mitchell, Head of Care**.

The DSL has a responsibility to:

- Liaise with the LA, Social Services (Social Services), Police and other agencies on individual cases of suspected or identified abuse – in Surrey referrals should be made through the Multi-Agency Safeguarding Hub (MASH)

- Act as the contact person/s within the school (this may be delegated to other members of the Safeguarding Team with the approval and supervision of the Designated Safeguarding Lead)
- Act as the first point of contact for any drug-related activity (please refer to the Substance Misuse Policy for further details)
- Be responsible for co-ordinating action within the school on safeguarding issues
- Liaise with staff on a 'need to know' basis so that students' rights to confidentiality are ensured
- Oversee the planning of any curricular or other provision
- Represent the school at child protection meetings and be a member of the 'core group' if required
- Ensure staff are familiar with this policy and procedure, Local Authority Child Protection Procedures, the LA Guidelines and relevant government guidance
- Raise awareness about child protection and safeguarding and arrange training for staff
- Call multi-agency Best Interest meetings where appropriate
- Refer cases to the Channel programme as required, where there is a radicalisation concern
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or has left due to risk/harm to a student to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required

OHC&AT DSLs undertake Level 3 training in order to undertake their roles. All safeguarding leads receive updated training at least every two years. Additionally, all safeguarding leads receive regular supervision from the OHC&AT Director of Safeguarding & Learning Support Services in accordance with our Safeguarding Supervision Policy.

Key roles and responsibilities within OHC&AT and Grafham Grange School are detailed below.

### **Within OHC&AT**

#### **Directors will:**

- Monitor updated policies on an annual basis and receive termly Safeguarding data reports.
- Monitor the role of the Safeguarding Team in each OHC&AT provision through the portfolio governor and director for Safeguarding in each Local Governing Body/College Committee and Board of Directors.
- Ensure they are aware of current legislation and Academy/College responsibilities and that their own training in these areas is up to date.

#### **The Director of Learning Support Services will:**

- Supervise the practice of Designated Safeguarding Leads in line with OHC&AT's Safeguarding Supervision Policy.
- Conduct safeguarding audits of each OHC&AT provision at least annually.

### Within each OHC&AT provision

#### **The Designated Safeguarding Lead (and Safeguarding Team) will:**

- Ensure all staff and local governors are aware of this policy and related documentation.
- Support staff involved in reporting incidents.
- Ensure the Safeguarding Team is up to date in terms of training and is fully involved and supported in decisions made.
- Ensure all staff receive regular update training on such current safeguarding issues as peer on peer abuse, child sexual exploitation, female genital mutilation, forced marriage, bullying, hate crime, radicalisation and domestic violence.
- Ensure staff teams are aware of how to identify and respond to risks to children and young adults from extreme or radical views.
- Discuss concerns and support colleagues to arrive at effective responses within the confidentiality of the Safeguarding Team.
- Generate timely departmental safeguarding reports.
- Generate timely accident & incident reports.
- Attend (as appropriate) Local Authority Designated Person Support Network meetings.

#### **The Senior Leadership Team will:**

- Ensure all staff are aware of this policy and related documentation.
- Support staff involved in reporting incidents where necessary.
- Ensure that an up to date Single Central Record of DBS checks is maintained within their provision at all times.
- Provide termly safeguarding data reports to governors.
- Provide monthly safeguarding data reports to the OHC&AT Executive Senior Leadership Team (ESLT).
- Ensure that recruitment of staff is conducted in line with Safer Recruitment practices.

#### **All staff will:**

- Maintain professional relationships with students **at all times**. No attempt should be made to build or encourage any friendship with students or their families outside of work. This includes telephone and personal contact and connecting via social media.
- Ensure that any and all correspondence with students and their families is via OHC&AT systems. Staff **must not** give their personal contact details to students including e-mail, home or mobile telephone numbers.
- Ensure they are aware of and adhere to this policy and all related policies and procedures listed at the end of this document.
- Ensure they are familiar with and adhere to all relevant procedures involved in recognising and reporting incidents.
- Report all concerns, without judgement about their significance, to the Designated Safeguarding Lead.
- Adhere to appropriate confidentiality.

- Ensure their own training is regularly updated, including safeguarding training that encompasses the Prevent duty.

## **CHILD PROTECTION AND SAFEGUARDING – RECOGNITION AND RESPONSE TO ABUSE**

Abuse can take a number of forms:

- **Physical:** causing physical harm to a child or vulnerable adult by hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or some other method. Physical harm can also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child or vulnerable adult.
- **Emotional:** the persistent emotional maltreatment of a child or vulnerable adult in a way likely to cause severe and persistent negative effects on that person's emotional development.
- **Sexual:** forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not that person is aware of what is happening. Sexual abuse includes both physical contact and non-contact activities.
- **Neglect:** the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of that person's health and/or development.
- **Financial:** being denied access to funds, having funds misappropriated or misused by others, being pressured or manipulated into giving money away or using it in a way the vulnerable person does not wish.
- **Institutional:** the mistreatment, abuse or neglect of a child or vulnerable adult by a regime or individuals.

It is important to recognise the multitude of abusive situations that overlap within these definitions. Children and vulnerable adults may be at risk of abuse through such varied issues as bullying (including cyberbullying), substance misuse, child sexual exploitation, female genital mutilation, forced marriage, radicalisation and extremist behaviour, abuse related to protected characteristics e.g. racism/sexism/homophobia, domestic violence, gang violence, sexting and others.

It is also important to recognise that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting. All staff must remain alert to the possibility of peer on peer abuse and take appropriate action to safeguard those involved, in line with this procedure.

Please refer to Appendices 1 and 3 for further detail on specific categories of abuse.

Staff may become aware of abuse in a number of ways, including:

- Disclosure by a student
- Disclosure or remarks made by another party (e.g. carer, other professional, member of the public)
- Discovery of bruising or marks on a student's body



- Unexplained changes in behaviour or personality
- Evidence of disturbance or explicit detail in drawing, writing or play
- Evidence of neglect in terms of cleanliness, personal hygiene, failure to thrive or apparent exposure to unnecessary risks
- Persistent lateness, poor or irregular attendance or persistent absence from school

## **SAFEGUARDING – PROVIDING A SAFE ENVIRONMENT**

Every OHC&AT Academy and College centre works to safeguard children and young people by:

- Ensuring provision is designed to acknowledge the potential vulnerability of all its students to be abused, particularly the additional vulnerability of students with special educational needs and disabilities (SEND).
- Ensuring provision is designed to equip students with the relevant knowledge and understanding to recognise potential abuse and know what they can do to keep themselves and others safe.
- Supporting students to be confident and have good self-esteem.
- Listening and responding to students and valuing all forms of communication, including non-verbal, assistive and augmentative communication, and behaviour including challenging behaviour.
- Operating effective systems to enable students to communicate that they feel safe or unsafe.
- Providing learning experiences based on Spiritual, Moral, Social, and Cultural (SMSC) values to foster an environment of mutual respect, tolerance, and understanding for all, regardless of religion, gender, culture or ability.
- Ensuring staff understand, through regular training and updates, the many different forms that abuse can take, including (but not limited to) peer on peer abuse, hate crime, child sexual exploitation, domestic violence/abuse, radicalisation, gangs and youth violence, faith abuse, bullying (including cyberbullying), discriminatory abuse e.g. racism/ homophobia/ transphobia, gender-based violence, female genital mutilation, neglect, substance misuse, fabricated or induced illness, trafficking and forced marriage.
- Ensuring staff are aware of the possibility of abuse in any form and are supported to know how to address this.
- Having clear procedures as detailed in this document for reporting and responding to allegations and concerns about abuse.
- Working co-operatively with other agencies.

- Operating a Safeguarding Team to ensure decisions concerning complicated and sensitive issues are arrived at through informed discussion, whilst respecting confidentiality.
- Operating a policy and practice of safe recruitment in accordance with *Keeping Children Safe in Education* (2016).
- Carrying out enhanced Disclosure and Barring Service (DBS) checks for all employees, agency staff, contractors and volunteers and maintaining an internal DBS Single Central Record at each setting.
- Operating a comprehensive range of generic and personalised individual student risk assessments to ensure students are safe whilst at OHC&AT provisions or undertaking related activities within work placements and the community.
- Ensuring all risk assessment changes and new safeguarding-related information are incorporated into student information accessible to staff, whilst still ensuring confidentiality where applicable.
- Operating an E-Safety Policy and good practices to ensure students can maximise the potential of technology whilst remaining safe and developing an age-appropriate understanding of potential threats such as cyberbullying, sexting, revenge porn and stalking.
- Creating awareness of the dangers of downloading and sharing inappropriate material which is illegal under the Counter-Terrorism Act (2015).
- Operating a Positive Behaviour policy with incorporated best practice guidance around physical intervention, to build respect and communication between staff and students and to ensure that behaviour at all provisions is managed in a positive, safe and supportive way.
- Adhering to the Prevent Duty, ensuring staff are able to protect children and young people who are vulnerable or at risk of being radicalised.
- Carrying out a PREVENT risk assessment to assess and review any potential risk of radicalisation to students.
- Promoting awareness of the Channel programme which provides support for children and young adults identified as being at risk of radicalisation.
- Operating a comprehensive and regularly reviewed suite of Health & Safety policies and procedures, including Fire Safety, Critical Incident Plan and Lockdown Procedure, and ensuring that staff are regularly trained in all relevant aspects of health and safety practice.
- Operating a Relationships and Sex Education policy alongside an RSE curriculum appropriate to each provision in order to support students to develop

their understanding of how to keep themselves and others safe in relationships and sexual situations.

- Having regard to the DfE guidance document 'Children Missing Education' (2016) and operating suitable reporting procedures accordingly. All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. A child going missing from education is a potential indicator of abuse or neglect. OHC&AT students above compulsory school age are also vulnerable to these risks, and thus OHC&AT extends this consideration to students over 18. Grafham Grange School staff will follow safeguarding procedures as detailed in this document for dealing with students that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.
- Observing Local Authorities' Child Sexual Exploitation Strategy. The **Statutory definition of Child Sexual Exploitation** is given below.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- Having regard to Deprivation of Liberty Safeguards, which are safeguards for people who lack capacity to make decisions regarding their own safety. Every OHC&AT Academy and College centre provides a safe environment for the diverse needs of all its students, ensuring the safety and due liberty of them all as individuals. OHC&AT staff ensure that student choice and best interest is considered at all times and that decisions being made suit the needs of the student to which they pertain.
- Operating a comprehensive and regularly reviewed suite of policies and procedures designed to safeguard the wellbeing of children and vulnerable adults, and ensuring that staff understand and enact these policies and procedures – please refer to the full list of Related Policies and Procedures at the end of this document.

## **SAFEGUARDING MECHANISMS**

OHC&AT and Grafham Grange School operate a range of mechanisms to ensure that all staff understand their roles and responsibilities with regard to safeguarding.

## **Staff training and related requirements**

All staff must read and sign the latest version of 'Keeping Children Safe in Education', upon commencing employment and whenever the guidance is updated. All staff are given safeguarding training, including training on the Prevent duty and Channel, on an annual basis and regular safeguarding updates are provided in order to ensure that staff are fully up to date with the relevant skills and knowledge.

Upon induction, staff are required to read all safeguarding related policies and procedures, and to sign and date to confirm that they understand their roles and responsibilities with regard to safeguarding.

Other mechanisms include, but are not limited to:

- safeguarding induction, including safeguarding learning walks to help assess the impact of training and to identify support needs
- whole school annual safeguarding training
- online safeguarding training with online exam questionnaire
- safeguarding quizzes
- safeguarding refresher workshops, which are held on the vast majority of training days
- regular contact between governors/Directors with the portfolio for Health & Safety, Child Protection & Safeguarding and Principals/OHC&AT senior staff
- emails to staff regarding key issues, updates and individual early help plans
- all recruitment being conducted in accordance with Safer Recruitment practices
- clear expectations for all staff around acceptable use of technology in accordance with the IT Acceptable Use Policy – staff understand that they must not use their personal devices around students or to take photographs of students, and that they must not divulge their personal contact details or connect with students on social media

The child protection/safeguarding register is maintained by the DSL and all staff working with students are informed of all matters relating to students in their classes. In addition to our child protection/safeguarding register, the DSL keeps comprehensive records of any and all concerns raised, and the actions taken.

Regular feedback to the governing body on all safeguarding issues is provided by the DSL and the Senior Leadership Team (SLT), through regular contact with the portfolio governor for Health & Safety, Child Protection & Safeguarding as well as termly reporting to the Local Governing Body. OHC&AT Directors receive termly data and portfolio reports from academy and College LGBs.

Safeguarding also forms part of the regular quality monitoring visits made to academies and College centres by the OHC&AT Executive Senior Leadership Team (ESLT).

## **Recruitment and disclosure**

OHC&AT recruitment is always conducted in accordance with Safer Recruitment procedures. Every interview panel has at least one member who is Safer Recruitment

trained. Once an offer of employment has been made, OHC&AT will apply for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the College or Academy which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's or Adults Barred List and to obtain other relevant suitability information.

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to OHC&AT. It is a condition of employment with the College/Academy that the **original** disclosure certificate is provided to the College/Academy as soon as is practical after the certificate is received.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the College/Academy.

Additional pre-employment checks (verification of identity, address and qualifications; references) are carried out for every candidate, as well as (where relevant to the role) checks on prohibition from teaching, EEA Sanction, prohibition from management and childcare disqualification. Please refer to our Recruitment & Selection Policy and Procedure for full details.

If there is a delay in receiving a DBS disclosure the Principal has discretion to allow an individual to begin work pending receipt of the disclosure certificate. **This will only be allowed if all other checks, including a clear check of the Children and Adults' Barred List (where the position amounts to regulated activity) and receipt of satisfactory references, have been completed and once appropriate supervision has been put in place.** A risk assessment which must be completed and signed prior to the start of employment. Final authorisation is required by OHC&AT HR.

## Visitors

Visitors to OHC&AT premises will be accompanied at all times by a member of staff. Risk assessments are carried out as necessary e.g. for speakers invited to academies or College centres. Upon arrival, all visitors to academies and College centres are provided with key safeguarding information as well as the Family & Visitors Code of Conduct and asked to provide confirmation of identity.

## Working with families

Keeping relevant, up-to-date and accurate information about our students is a key aspect of effective safeguarding. We will regularly ask all families to provide us with the following information and to notify us of any changes that occur:

- Names and contact details of persons with whom the student normally lives
- Names and contact details of all persons with parental responsibility
- Names and contact details of **at least** three emergency contacts for the student

- Details of any persons authorised to collect the student from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the student (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of the student's general practitioner
- Any other factors which may impact on the safety and welfare of the student

Information about students given to us by the students themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a "need to know" basis in order to support the student if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection or safeguarding nature. We understand that this is in the best interests of the student and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to keep any records which relate to child protection/safeguarding work undertaken by us or our partner agencies and to ensure that these are kept apart from the main student record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school or other provider to which the student transfers.

If we have a reason to be concerned about the welfare of a student we will always seek to discuss this with the student's family in the first instance, subject to the conditions laid out in our Safeguarding Procedure (below). On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to social care services when to do otherwise may put the student at risk of further harm either because of delay, or because of the actions of parents or carers.

## **SAFEGUARDING PROCEDURE**

### **RESPONDING TO CONCERNS ABOUT INDIVIDUAL STUDENTS**

Staff must follow OHC&AT's safeguarding procedure if they have any concern regarding a student. However, staff should also be aware that **if there is a risk of immediate serious harm to a student, a referral can and should be made to social care immediately** and that **anybody can make a referral**. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration.

All students at Grafham Grange School must be able to place their trust and confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately. All staff must therefore know what to do if someone chooses to talk to them about any matter which raises safeguarding concerns.

When listening to an allegation of abuse, staff must:

- Listen without interruption or judgement to what is being said
- Avoid using leading questions. Open questions and phrases should be used as much as possible; for example ask 'What did you see?' and not 'Did you see...?'
- Wait to seek help until after the disclosure has been made
- Respect the person's right to privacy but not promise confidentiality
- Reassure the person making the disclosure that he/she has done the right thing in sharing
- Explain to the person that in order to keep him/her safe from harm the information that has been shared must be passed on
- Report what has been disclosed to the DSL as soon as possible, or in their absence, one of the DDSLs
- Record, as soon as is practicable, but within 24 hours what was said using the person's actual words. Records must be signed and dated.
- Remember that if there is a risk of immediate serious harm to a student a referral can and should be made to social care immediately and that anybody can make a referral. If the student's situation does not appear to be improving, the staff member with concerns should press for re-consideration.

Wherever a member of Grafham Grange School staff suspects abuse, or witnesses an incident that appears to be abuse, or whenever a disclosure is made to a member of staff, that person must report it to the DSL as soon as possible for advice and guidance. In their absence they should inform a member of the school Safeguarding Team.

A confidential report on the incident should be completed as soon as possible if alleged abuse has been witnessed or is suspected. This report must be handed to the DSL or, if they are not available, to a member of the school Safeguarding Team.

The Principal must be informed of all allegations or suspicions of abuse. This will be done by the DSL. Action set out in this policy **should not** be delayed until this is done.

Grafham Grange School will stay closely involved and will check with the appropriate authorities that the allegation is being appropriately investigated.

### **Contact with the family**

Contact with the family should be discussed with the DSL, who may consult Social Services – either the designated Care Manager or the Duty Care Manager, the Education Welfare service or other relevant agencies. In Surrey all referrals are made through MASH. If the student resides in another borough, the referral should be made to that borough.

In cases where a minor physical injury causes concern, it may be appropriate to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the student from harm), the parent or carer will be informed that the matter must be referred to Social Services.

In cases of possible neglect or emotional abuse, the concern is likely to have built up over a period of time. There may have been discussion between Academy staff and the family about sources of help (e.g. Social Services), but if concerns persist, the DSL will need to refer to Social Services and will normally advise the family of this.

In cases where there are suspicions of sexual abuse, the DSL will seek immediate advice from Social Services staff before discussing the matter with the family.

### **Recording and reporting**

The person who has observed an incident must make an accurate report of it. This must be submitted to the DSL who will make any necessary additional notes.

The DSL (or a member of the Safeguarding Team at the request of the DSL) will complete the Academy's referral form or, in the case of an ongoing concern, add to the existing one.

All safeguarding emails sent outside of OHC&AT **must** be encrypted.

Social Services must be contacted about any allegations or suspicions of abuse. This will usually be done by the DSL. In making contact with Social Services or the Police, the caller must note that the issue is one of suspected abuse or a suspected crime against a child or vulnerable adult.

Written statements and the Academy's referral form must be provided by the Academy to Social Services or, if appropriate, the Police, including the details of allegations/incidents observed. These must be provided as soon as possible, preferably on the same day. Copies must be provided to the DSL immediately.

The person reporting the incident (unless otherwise agreed by someone in the Safeguarding team, the DSL) will contact the individual's named care manager or, if they do not have one, the duty manager.

All records relating to student welfare concerns will be retained in a safeguarding file held separately from the student's main file. Safeguarding files will be held in lockable storage accessible only to the Principal and the DSL, and clearly marked as 'Confidential – for attention of the Designated Safeguarding Lead'.

Information from records will only be used on a 'need to know' basis.

Relevant staff will be made aware when a student is subject to a Child Protection Plan, so they can monitor the student's welfare.

Records relating to the student's welfare will remain on the student's file as long as that person is a student at the Academy.



When the student leaves the Academy, other providers will be advised in writing that the Academy's records contain information about child protection/safeguarding concerns even where these are no longer current.

Safeguarding data reports must be provided to the OHC&AT Executive Senior Leadership Team (ESLT) monthly and to governors termly.

### **Where a criminal offence is suspected**

Wherever a criminal offence is alleged, or is suspected to have taken place, the police must be contacted. Grafham Grange School staff reporting to the LADO (or, if unavailable, MASH or other relevant contact) should clarify who will contact the police. If it is agreed that the LADO should contact the police, then the DSL will follow this up by making themselves known to the police and requesting confirmation as to whether the matter is being investigated.

### **Immediate risk or danger**

If an individual is at immediate risk, or in situations where there is forensic evidence, then the police and, if appropriate, other emergency services must be contacted immediately. In such cases the emergency services should be called before informing the DSL or a member of the Safeguarding team.

### **Requests for assistance by other agencies**

The Academy is required to assist local authority Social Services or the Police when they are making enquiries about the welfare of children or vulnerable adults. Information about a child or vulnerable adult must therefore be shared on a 'need to know' basis with other agencies.

When telephone requests for information are received, always maintain security by checking the telephone number listing and calling back.

Always advise the DSL of any request for assistance from other agencies.

Requests for attendance at meetings about individual students (e.g. Child Protection conferences) should be notified to the DSL, who will arrange preparation of a report and attendance at the meeting.

Reports should contain information about the student's:

- academic progress
- attendance
- behaviour
- relationships with peers and adults
- family
- any other relevant matter

Reports should be objective and distinguish between fact, observation, allegation and opinion.

Unless otherwise specified, reports will normally be made available to the student's family.

### **Students subject to a Child Protection Plan**

The Academy will be told by the relevant Social Services when a student is subject to a Child Protection Plan (previously the CPR). The name of the key care manager must be clearly recorded on the student's record.

The Academy will participate fully in the work of the core group, to assist with the objectives of the Child Protection Plan.

When a student is on a Child Protection Plan, the Academy will report all absences, behavioural changes or other concerns to the key social worker.

When a student on a Child Protection Plan leaves the Academy, all the safeguarding information should be transferred to the new provision.

### **MANAGING ALLEGATIONS OF ABUSE AGAINST STAFF**

Grafham Grange School will always supervise staff and act on any concerns that relate to the safeguarding of children or vulnerable adults.

Allegations or concerns about a member of staff, worker or volunteer must immediately be notified to the DSL and the Principal as well as the OHC&AT Director of Safeguarding & Learning Support Services (or the Safeguarding Governor, the OHC&AT Executive Director, Quality & Development/Deputy CEO and the OHC&AT Director of Safeguarding & Learning Support Services if the concern is about the DSL/Head) and the same principles of safeguarding applied as detailed elsewhere in this document. It is important to bear in mind that although concern may relate to an individual students, other students may also be at risk.

The Principal (or Safeguarding Governor) will always consult the Local Area Designated Officer (LADO) about allegations against members of staff.

The LADO is responsible for managing child protection/safeguarding allegations against staff and volunteers who work with children or vulnerable adults.

A referral should be considered if there is a concern that a member of staff or a volunteer who works with children or vulnerable adults has:

- Behaved in a way that has harmed a child/vulnerable adult or may have harmed a child/vulnerable adult
- Possibly committed a criminal related offence against a child/vulnerable adult
- Behaved towards a child/vulnerable adult in a way that indicates that they are unsuitable to work with children/vulnerable adults.

The LADO will make a decision as to which of the following needs to happen:

- An initial evaluation meeting (this is normally a telephone discussion between the referrer and the LADO)
- A LADO process (a senior strategy meeting)
- A joint or single-agency investigation
- Advice regarding potential capability or disciplinary procedures to be used by the employer
- A referral to another agency
- A complaints investigation
- Further enquiries to be made
- No further action

Following discussions with the LADO, the Principal (or Safeguarding Governor, OHC&AT Executive Director, Quality & Development/Deputy CEO or OHC&AT Director of Safeguarding & Learning Support Services in discussion with OHC&AT HR) will decide on appropriate action, which may include:

- Suspension of the staff member;
- Consideration of disciplinary proceedings – please refer to the OHC&AT Disciplinary Procedure for further details;
- If suspension is not agreed, but there is an ongoing investigation, then a risk assessment should be carried out and agreed by the OHC&AT Director of Safeguarding & Learning Support Services.

Confidentiality is essential and information about an allegation must be restricted to those who have a need to know in order to: a) protect children/vulnerable adults, b) facilitate enquiries, c) avoid victimisation, d) safeguard the rights of the person about whom the allegation has been made and others who might be affected and e) manage disciplinary/complaints aspects.

### **Informing the subject of an allegation**

The Principal (or OHC&AT Director of Safeguarding & Learning Support Services/OHC&AT Executive Director, Quality & Development/Deputy CEO) should inform the accused person about the allegation as soon as possible, but only after consulting the LADO about whether this is appropriate at this stage and what information can be given to the person.

The subject of the allegations (whether suspended or not) shall be: a) advised to contact her/his trade union or professional association, b) treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes, c) kept informed of the progress of the case and of the investigation, d) clearly informed of the outcome of any investigation and the implications for disciplinary or related processes and e) provided with appropriate support as appropriate.

### **Suspension**

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with students, pending investigations and procedures arising from the allegation. Suspension should not be automatic, but should be

considered if: a) there is cause to suspect a student is at risk of significant harm, b) the allegation warrants investigation by the police, or c) the allegation is so serious that it might be grounds for dismissal.

Any decision to suspend shall be taken only after consultation with the LADO. It will take into account the safety of the student or students involved and the impact on any enquiry.

Where it has been deemed appropriate to suspend the person, written confirmation will be provided in line with OHCAT's disciplinary procedure. The letter should be dispatched within 24 hours, giving the reasons for the suspension. The person should be informed at that point who their named contact is within the organisation and provided with their contact details.

### **Further action**

The school can only undertake an investigation after the LADO has considered the case and indicated that a local investigation can take place.

If, after appropriate consultation and investigation, it is decided that no further action is necessary, this decision and the reasons for it should be recorded by both the Senior Leadership Team and the LADO. They should agree between them the information that should be put in writing to the individual about whom the allegation was made. Both should then consider the action that should follow in respect of that individual and also the person (or persons) who made the allegation.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references, in line with Keeping Children Safe in Education (2016).

If, following the conclusion of child protection/safeguarding processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Grafham Grange School will refer to the DBS any member of staff who:

- is dismissed because of misconduct relating to a child or vulnerable adult, as set out in Keeping Children Safe in Education (2016)
- leaves their employment during an investigation related to misconduct relating to a child or vulnerable adult

## **POLICY REVIEW INFORMATION**

<i>Version:</i>	2.0
<i>Reviewer:</i>	John Prior, Jackie Van-West
<i>Approval body:</i>	Family Board
<i>Date this version approved:</i>	16.03.18
<i>Due for review:</i>	Spring 2019

## **RELATED POLICIES AND PROCEDURES**

Anti-Bullying Policy  
Anti-Radicalisation Policy  
Complaints Policy and Procedure  
Data Protection Policy  
Educational Visits Policy  
E-Safety Policy  
Exclusions Policy  
Fire Policy and Procedures  
Health & Safety Policy  
Personal & Intimate Care Policy  
Missing Child Policy  
Positive Behaviour Policy  
Recruitment & Selection Policy  
Relationships & Sex Education Policy  
Risk Assessment Policy  
Safeguarding Supervision Policy  
Staff Code of Conduct  
Substance Misuse Policy  
Supporting Pupils in School with Medical Conditions Policy  
Whistleblowing Policy

## **FURTHER INFORMATION, ADVICE AND GUIDANCE**

Keeping children safe in education (DfE, 2017)

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Protecting children from radicalisation: the Prevent duty (DfE, 2015)

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

Sexual violence and sexual harassment between children in schools and colleges (DfE, 2017)

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Working together to safeguard children (DfE, 2017)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

Child sexual exploitation: definition and guide for practitioners (DfE, 2017)  
<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Children missing education (DfE, 2016)  
<https://www.gov.uk/government/publications/children-missing-education>

What to do if you're worried a child is being abused (DfE, 2015)  
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused-2>

Exclusion from maintained schools, academies and pupil referral units in England (DfE, 2017)  
<https://www.gov.uk/government/publications/school-exclusion>

## **APPENDIX 1: SAFEGUARDING AND CHILD PROTECTION IN SPECIFIC CIRCUMSTANCES**

### **PEER ON PEER ABUSE**

Peer on peer abuse refers to children or young people being bullied, exploited or harmed by other children or young people. It includes, but is not limited to, harmful sexual behaviour, physical abuse (e.g. violence, particularly pre-planned; forcing the use of drugs or alcohol), emotional abuse (e.g. blackmail, extortion, threats, intimidation), sexual abuse (e.g. indecent exposure, touching, sexual assault, sexting, forcing the watching of pornography) and/or sexual exploitation (e.g. photographing or videoing indecent acts). It is also recognised that gang activity is an additional risk factor for peer on peer abuse.

#### **Harmful sexual behaviour**

Harmful sexual behaviour is defined as behaviour that is problematic, abusive and violent, and that may cause developmental damage. The NSPCC advises that harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.

It is important to note that harmful sexual behaviours can occur both online and offline, and sometimes simultaneously between the two.

Children and young people displaying harmful sexual behaviour have often experienced their own abuse and trauma, and it is imperative that they are offered appropriate support.

The NSPCC warns that sexualised behaviour which is significantly more advanced than that which is expected for the child's age, or that shows a lack of inhibition, could be cause for concern. Other warning signs the NSPCC says to look out for include:

- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex.

When considering whether behaviour is harmful, take into account the ages and stages of development of the children. Sexual behaviour can be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not). Keep in mind that it is possible for a younger child to abuse an older child, particularly where they have power over them, such as where the older child has disabilities or is small in stature.

Brook has developed a “sexual behaviours traffic light” tool which can help schools make decisions about whether sexual behaviour is harmful or natural. The tool can be accessed via this link: <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> Use of the safety planning and recording NSPCC document which is used in collaboration with the Brook Traffic Light Tool was rolled out across OHC&AT from January 2018.

OHC&AT safeguarding training includes information on harmful sexual behaviour. Detailed advice on harmful sexual behaviours is also available from local specialist violence centres – staff should contact Rape Crisis (<https://rapecrisis.org.uk/>) or the Survivors Trust (<http://thesurvivorstrust.org/>) to find their nearest centre.

Addressing harmful sexual behaviours early can prevent future problematic, abusive and/or violent behaviour.

### **Minimising the risk of peer on peer abuse**

A robust induction system ensures that we are informed as to whether a student arrives or re-joins presenting a possible safeguarding concern, for example returning to school following a period in custody or having experienced serious abuse themselves. Intelligent timetabling, groupings, supervision and personalised risk assessments, including daily dynamic risk assessments, are central to the effective management of safety in our schools. Additionally, we maintain a strong focus within curriculum provision on building healthy relationships and being and keeping safe, in order to foster a positive environment and promote positive behaviour.

### **Managing allegations against other students**

When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern:

- The DSL should be informed in line with the safeguarding procedure as laid out in this document.
- A factual record (signed and dated) should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
- The DSL will contact social care services to discuss the case. It is possible that social care services are already aware of safeguarding concerns around the student. The DSL will follow through the outcomes of the discussion and make a social care services referral where appropriate.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both students' files.
- If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents of all students involved in the allegation informed.
- It may be appropriate to exclude the student being complained about for a period of time, as per our Positive Behaviour, Anti-Bullying and/or Exclusion policies.



- Where neither social care services nor the police accept the complaint, a thorough school investigation will take place in any case, using our internal procedures.
- In situations where the DSL considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan which will be monitored and evaluated with all adults working with the student.

## ATTENDANCE AND CHILDREN MISSING EDUCATION (CME)

We know that a student's unexplained absence from school could mean that they are at risk of harm and that a child or vulnerable adult going missing from education is a potential indicator of abuse or neglect. Grafham Grange School has a clear attendance policy in place:

- Any student going missing from education will always get immediate attention from the DSL. Staff are trained to be alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.
- When a student is absent without notification, the attendance administrator will record the absence in the register and the school will endeavour to contact the parents/carers and other emergency contacts in order to determine the reason for the absence. This will happen for every day of non-attendance where no call has been received informing us of absence and reasons why.
- Any unexplained absence of a child with a Child Protection Plan will be reported to the child's social worker within one day.
- Where a student does not present for school as expected, the school will endeavour to ascertain that student's whereabouts and wellbeing without delay, using all available parent/carer and secondary/emergency contact details. Where no contact can be made with either the student or any named emergency contacts, a member of school staff should generally attend the student's home. If the student or a named contact still cannot be contacted, the school must report this to relevant personnel in the Local Authority and, where deemed necessary, the police. However, it is acknowledged that in some exceptional, local circumstances, such action may be counter-productive and it is for the school to risk assess such a scenario on the first day. Regardless of this, if a student is absent for a second consecutive day without notification from a named contact, the school **must** report this to relevant personnel in the Local Authority and, where necessary, the police. We will always report to the Local Authority the name of any student who has been newly registered to attend our school but does not arrive on the expected day.
- We will always report to the Education Welfare Service the continued absence of a student known or thought to have been taken overseas if the student does not return to school on the expected return date.
- We maintain accurate attendance and admissions registers (all students are on both), in line with statutory requirements. This includes paying careful attention to off-rolling students in association with the Local Authority and knowing, and recording, student destinations consistently on the admissions register. Where

a student destination is unknown, and unable to be sought after significant follow-up, the Local Authority, Education Welfare Service and/or social care services will be informed.

- We do not 'delete' students from the admissions register. We alert the student's Local Authority immediately if:
  - the student has been taken out of school by their parents and is being educated outside the school system e.g. home education
  - the student has ceased to attend school
  - the student has been certified as medically unfit to attend school or is in custody.

Keeping Local Authorities up to date is crucial so that they can check if children of compulsory school age/vulnerable adult students are missing education, and might therefore be in danger of not receiving an education and be at risk of abuse or neglect.

On the rare occasions that we exclude students for a fixed term, we put this in writing to both the family and the placing Local Authority. While we provide the student with work to complete during their external exclusion (and mark it), we are not responsible for the student's safety and welfare during their time at home.

## **BULLYING**

Bullying is a safeguarding issue. The OHC&AT Anti-Bullying Policy applies across the whole organisation and makes clear that bullying of any kind against students or staff is wholly unacceptable. It is the responsibility of the whole OHC&AT community to promote an ethos of mutual respect, fairness and equality in everything we do, in order to create a positive atmosphere for all. We will always take seriously any reports of bullying and respond appropriately, as set out in the Anti-Bullying Policy.

We understand that bullying may take different forms and may include, as examples, racist, sexist, homophobic, transphobic and biphobic behaviours. All staff are clear about the Protected Characteristics, as prescribed in the Equality Act 2010 (see our equality policy). Any such reported or observed incident will be dealt with in accordance with the OHC&AT policy.

## **CHILD EMPLOYMENT**

Only children over the age of 13 may be employed to do light work. Regulations determine the type of work and restrict the hours a child may be employed for. Children working in the UK who are still of compulsory school age are required to have a work permit in all cases; it is illegal for a child to work and not have a work permit, even if this is in a family business. Different regulations apply to children in entertainment, where children under thirteen may be licensed to perform in commercial performances under strict guidelines and controls. Further information on children in employment can be found at <https://www.gov.uk/child-employment>

## **CHILD SEXUAL EXPLOITATION (CSE)**

Sexual exploitation can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention/affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. It is important to note that the victim may have been sexually exploited even if the sexual activity appears consensual. Grafham Grange School will be alert to the risk of CSE and will attempt to identify pupils who are vulnerable to, or at risk of, sexual exploitation and who need services and interventions to keep them safe. We will pass on any information about CSE issues affecting the schools, for example concerns about adults hanging around the school, to the police.

## **E-SAFETY**

The impact of technology on the lives of all citizens increases yearly, particularly for children and young people who are keen to explore new and developing technologies. Technology is transforming the way that schools teach and students learn. At home, technology is changing the way people live and the activities in which they choose to partake. Ensuring that students can safely access new technology and learn how to participate in the digital world without compromising their safety and security is a key part of delivering a well-rounded programme of education.

Developing technology brings opportunities; it also brings risks and dangers, including:

- Access to illegal, harmful or inappropriate images or other content
- Unauthorised access to, loss of, and sharing of personal information
- Grooming
- Radicalisation
- The sharing and distribution of personal images without an individual's consent or knowledge
- Inappropriate communication and contact with others
- Cyber-bullying
- Sexting
- Access to unsuitable video and internet games
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- Plagiarism and copyright infringement
- Illegal downloading of music or video files
- Excessive use which may impact on social and emotional development and learning
- Risks related to geolocation facilities

OHC&AT and Grafham Grange School operate a clear E-Safety Policy which sets out how we work to keep students safe while maximising the educational potential of technology. Additionally, all staff are required to abide by OHC&AT's Staff Code of

Conduct, IT Acceptable Use Policy and Photo Permission Policy, which all include clear requirements regarding safeguarding and e-safety.

## **EXTREMISM AND RADICALISATION**

Radicalisation (the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind) and extremism (the holding of extreme political or religious views) are increasingly recognised as serious threats to the safety and wellbeing of children, young people and families. OHC&AT and Grafham Grange School are aware that children and young people with SEND may be more vulnerable to extremism and radicalisation.

To that end, we are committed to safeguarding students from radicalism and extremism. OHC&AT's Anti-Radicalisation Policy and E-Safety Policy should be read in conjunction with this policy and procedure. Safeguards in place include:

- All governors, teachers, teaching assistants and non-teaching staff will have an understanding of what radicalisation is and why we need to be vigilant in school or college.
- All governors, teachers, teaching assistants and non-teaching staff will receive regular training and updates on the Prevent duty and Channel process.
- All governors, teachers, teaching assistants and non-teaching staff will understand this policy and will follow the procedure when issues arise.
- All students, parents/carers and families will know that OHC&AT has policies in place to keep students safe from harm and that these policies, procedures and systems are regularly reviewed to ensure they are appropriate and effective.
- Our curriculum will actively promote the understanding of British values including democracy and the rule of law, as well as supporting our students to develop good self-esteem and positive relationships with peers and other members of their communities.

## **FEMALE GENITAL MUTILATION (FGM)**

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone. FGM forms part of our annual safeguarding update training for all staff. School staff should be alert to any or all of the following indicators:

- The family comes from a community that is known to practise FGM;
- A student may talk about a long holiday to a country where the practice is prevalent;
- A student may confide that she is to have a 'special procedure' or to attend a special occasion;
- A student may request help from a teacher or another adult;

- Any female child born to a woman or has a sister who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family.

It is illegal in the UK to allow girls to undergo FGM either in this country or abroad. It is important to note that all staff have a duty to report personally any concerns they may have about girls at risk of FGM to the police. Any concerns must be immediately shared with the DSL and staff are aware that they have a mandatory duty to report known cases of FGM.

## **FORCED MARRIAGE AND HONOUR-BASED VIOLENCE**

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. Someone who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the person themselves, their peer group, a relative or member of their local community, or from another professional. Forced marriage may also become apparent when other family issues are addressed e.g. domestic violence, self-harm, child abuse or neglect. Forced marriage may involve the person being taken out of the country for the ceremony and is likely to involve non-consensual/underage sex. Refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Honour-based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates, meaning victims are a risk for their parents and families.

School staff **must** respond to suspicions of a forced marriage or honour based violence by immediately alerting the DSL who will make a referral to Social Care and, if the risk is acute, to the Police. School staff should not treat any allegations of forced marriage or honour based violence as a domestic issue and send the student back to the family home. It is not unusual for families to deny that forced marriage is intended and, once aware of professional concern, they may move the student and bring forward both travel arrangements and the marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the student and family, as this will alert them to agency involvement. Further information and advice can be obtained from the Forced Marriage Unit [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage) or 020 7008 0151 and the Honour Based Violence Helpline 0800 599 9247.

## **HEALTH & SAFETY**

OHC&AT operates a clear Health & Safety Policy as well as a suite of related policies and procedures across the whole organisation, including (but not limited to) core Health & Safety, Fire Safety, Risk Assessment and Personal & Intimate Care. All staff, students, visitors and other stakeholders are required to understand and abide by these policies and procedures in order to safeguard every member of the OHC&AT community.

Grafham Grange School acknowledges its responsibility to safeguard all students in potentially vulnerable situations such as changing rooms, while also acknowledging the student's right to privacy.

## **PRIVATE FOSTERING**

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 years of age by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Each party involved in the private fostering arrangement has a duty to refer it to the Local Authority at least six weeks before the arrangement is due to begin, and not to do so would be an offence.

Grafham Grange School has a duty to inform social services if we become aware of a private fostering arrangement that has not been shared with the Local Authority. Although there is no duty for the school to be informed of private fostering arrangements it would be helpful if the family could pass on the information to ensure support can be put in place. Further information on private fostering can be found at <https://www.privatefostering.org.uk>

## **SEXTING**

The UK Council for Child Internet Safety (UKCCIS) have produced guidance for schools on how to tackle sexting and 'youth produced sexual imagery' as sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks including embarrassment, bullying and increased vulnerability to child sexual exploitation, particularly if the imagery is shared further.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

Although the production of such imagery will likely take place outside of school, these issues often manifest in schools working with children and young people. Staff must respond swiftly and confidently to ensure that children are safeguarded, supported and educated.

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved.

- All incidents involving sexting and youth produced sexual imagery should be responded to in line with the school's cause for concern system.
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

## **SUBSTANCE MISUSE**

OHC&AT operates a clear Substance Misuse Policy across the whole organisation, which states our commitment to safeguarding students against the risks associated with substance misuse. OHC&AT and Grafham Grange School have clear expectations that no student or staff member will take part in drug-related activity as defined in our policy, and appropriate sanctions will be applied in any occurrence of substance misuse. We are also committed to providing support, advice and education about drugs and substance misuse as appropriate, both through embedded curricular provision which supports our students to make healthy choices and on a one-to-one basis as required. OHC&AT will never condone the misuse of substances or the possession or supply of illegal drugs, all of which will be viewed as a safeguarding concern.

## APPENDIX 2: INFORMATION AND GUIDANCE FOR STAFF

Below is a set of guidelines that staff should take on board when working with individual/small groups of students. It is important to be mindful at all times of your behaviour in relationship to individual/small groups of students and of the potential risk of an allegation.

**Staff should take necessary precautions in order to minimise the opportunity for an allegation to be made against them.** This is generally about exercising common sense, but all staff should specifically take note of the following:

- **Whenever possible try not to be alone in a room with a student, regardless of gender. If you are on your own with a student, leave the door open and inform a colleague if possible. Always keep an appropriate distance between you and the student.**
- **Do not engage in conversations with students about your personal life.**
- **Maintain clear professional boundaries between you and students, particularly if the conversation is regarding relationships, emotions and/or sexual content.**
- **Do not exchange mobile phone numbers with students. If possible, do not have your mobile phone out when dealing with an individual student.**
- **Do not accept students (or their family members) as 'friends' or links on social networking websites or mobile phone apps.**
- **If a student wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not probe a student about their personal life unless they approach you. Avoid giving advice to students about their relationships.**



### APPENDIX 3: DEFINITIONS AND CATEGORIES OF ABUSE

All children have certain basic needs. The NSPCC gives the following definition, following Christine Cooper's checklist:

- Basic physical care: warmth, shelter, adequate food and rest, grooming (hygiene) and protection from danger
- Affection: positive physical contact, comforting, admiration, delight, tenderness, patience, time, making allowances for annoying behaviour, and general companionship and approval
- Security: continuity of care, the expectation of continuing in the stable family unit, a predictable environment, consistent patterns of care and daily routine, simple rules and consistent controls and a harmonious family group
- Stimulation and innate potential: by praise and encouragement; curiosity and exploratory behaviour; by developing skills through responsiveness to questions and to play, by promoting educational opportunities
- Guidance and control: to teach adequate social behaviour which includes discipline within the child's understanding and capacity and which requires patience and a model for the child to copy, for example in honesty and concern and kindness for others
- Responsibility: for small things at first such as self-care, tidying playthings or taking dishes to the kitchen and gradually elaborating the decision making that the child has to learn in order to function adequately, gaining experience through his/her mistakes as well as his/her stresses and receiving praise and encouragement to strive to do better
- Independence: to make his/her own decisions first about small things but increasingly about the various aspects of his/her own life within the confines of the family and society's codes. Parents and carers use fine judgement in encouraging independence and in letting the child see and feel the outcome of his or her own capacity. Protection is needed, but over-protection is as bad as responsibility and independence too early

These can be seen to extend to vulnerable adults by virtue of the factors that make those adults vulnerable e.g. learning difficulties/disabilities or other additional needs that impact on the person's growth and development. Individual cases must always be treated on their own merits, however in general terms the following definition should provide the basis for action under these guidelines: *"A child is considered to be in need of protection when the basic needs of that child are not being met through avoidable acts of either commission or omission"*.

Staff should be alert to any changes in student behaviour which may indicate a safeguarding concern, including but not limited to:

- Unexplained absences or lateness
- Running away
- Self-harm
- Suicidal ideation/attempts
- Drug or alcohol misuse
- Wetting or soiling

- Deterioration in concentration and academic performance
- Anxiety
- Depression
- Avoidance of medical examination or reluctance to change for PE
- Low self-esteem and few friends
- Becoming unusually aggressive or withdrawn
- Excessive tiredness, poor sleep/nightmares
- Changes in eating habits

Before a student is placed on a Child Protection Plan a conference must decide that there is, or is a likelihood of, significant harm leading to the need for a plan. The following definitions are used for the plan. They are intended as a guide. In some instances more than one category may be appropriate.

## **NEGLECT**

*The persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, or the failure to protect a child or vulnerable adult from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out an important aspect of care, likely to result in the serious impairment of the child or vulnerable adult's health and/or development.*

Neglect can have severe and long-lasting consequences. It can also be hard to identify. A student displaying multiple or persistent signs of neglect (see below) could indicate a safeguarding concern. It should also be noted that neglect often accompanies other forms of abuse.

### **Signs to look out for:**

- Poor appearance and/or hygiene e.g. consistently dirty or smelly, very poor dental health, inadequate clothing for the season or occasion, unwashed clothing, hungry or without adequate provision for lunch
- Health and development problems e.g. untreated injuries or medical issues, failure to thrive, missed medical appointments, repeated accidental injuries, recurrent infections or illnesses, skin sores/rashes, malnutrition
- Indicators of possible issues around housing/family e.g. the student taking on caring responsibilities for other family members or being left alone for long periods of time

It is important to remember that neglect can occur in any family and staff should always be alert to the possibility of abuse, regardless of circumstance.

## **PHYSICAL ABUSE**

*Causing physical harm to a child or vulnerable adult by hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or some other method. Physical*

*harm can also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child or vulnerable adult.*

### **Non-accidental injuries**

It should not be assumed that an injury to a part of the body normally vulnerable to accidental injury has necessarily been caused accidentally. All injuries to children/vulnerable adults, which do not easily come into the category of normal bumps and scrapes, should be seen by a doctor.

Certain parts of the body are more commonly subjected to non-accidental injury. These include the upper arm, where a person may be gripped or shaken, the back, and the buttocks. Multiple injuries of various types, ages and location are common features of physical abuse.

Most non-accidental injuries leave marks on the body. PE teachers are therefore often key people in the identification of this form of abuse, as they regularly see students partially dressed.

### **Signs to look out for:**

- Reluctance to undress or to expose parts of their bodies e.g. while changing for PE
- Unexplained absences
- Physical signs of injury
- Unexplained or confused accounts of how an injury occurred
- Explanation of an injury which appears to be inappropriate to the nature and age of the injury

### **Common medical/physical factors associated with physical abuse**

#### Bruising

- Facial bruising around the mouth and ears.
- Groups of small bruises.
- Black eyes without a forehead injury, particularly if both eyes are affected.
- Weal marks or outline of bruising (e.g. hand mark).
- Bruising of soft tissue with no obvious explanation (most bruises occur on bony protuberances such as the temple or shin).
- Bruises on the back, back of legs, stomach, chest or neck.
- Bruises or cuts to mouth or tongue (e.g. split frenulum).
- Pinch marks are found in pairs and may be seen on the back, buttocks, arms or cheeks.

#### Bites

- Bites leave clear impressions of teeth and some bruising – they are never accidental.

- Parents/carers sometimes claim that bites have been made by peers or animals. It is therefore important to check the size and shape of the injury. If the impression is more than 3cms across it will have been caused by an adult or adolescent.
- Bites can be inflicted almost anywhere on the body.

### Burns and scalds

- Children/vulnerable adults will sometimes suffer minor burns through hot irons etc. but it is uncommon for multiple burns to be caused accidentally.
- A cigarette burn is characteristically round but may have a tail when dragged against the skin, and is surrounded by an area of inflamed skin.
- Cigarette burns can be found in groups and can be found on any part of the body.
- Scalds from boiling water may result from lack of supervision, or non-accidentally.
- A child or vulnerable adult is very unlikely to sit down willingly in very hot water; therefore they cannot scald a bottom accidentally without also scalding the feet.
- Burns and/or scalds are particularly worrying as a degree of sadism may be involved when such injuries are inflicted.

### **Associated factors**

- Injuries not consistent with explanation given by parent/carer (even if agreed by the student)
- Circumstances where parent/carer delays seeking medical advice
- A history of repeated injuries or presentation to A&E
- Consent for a medical refused by parent/carer
- Desire of a parent/carer to attribute blame elsewhere
- Distant or mechanical handling of the student by the parent/carer

### **SEXUAL ABUSE**

*Forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the victim is aware of or understands what is happening. Sexual abuse includes both physical contact and non-contact activities.*

### **What is sexual abuse?**

Sexual abuse can be one or more of the following:

- Rape or penetration with an object or body part
- Sexual touching of any part of the body
- Forcing or encouraging a child/vulnerable adult to take part in or observe sexual activity
- Forcing or encouraging a child/vulnerable adult to undress and/or engage in sexual touching
- Grooming a child/vulnerable adult with intent to abuse them

- Involvement in the making, distributing or viewing of child abuse images
- Sexually exploiting a child/vulnerable adult

Both boys and girls can suffer from sexual abuse. Both men and women can be perpetrators – people who disclose sexual abuse from a female perpetrator are often met with disbelief. It is therefore important to listen to what a student says without being judgemental. Abusers can be relatives, friends, teachers, childcare workers, authority figures or strangers. Warning students about Stranger Danger should therefore only form part of any child protection/safeguarding programme.

### **Signs to look out for:**

- Sexual interest/activity inappropriate to the student's age or developmental stage e.g. excessive preoccupation with or precocious knowledge of adult sexual behaviours
- Sexualised behaviour inappropriate to the student's age or developmental stage
- A marked fear of certain people or groups of people
- Avoidance of being alone with people
- Pregnancy in young teenagers where the identity of the father is vague or unknown
- Recurrent urinary tract infections
- Signs of sexually transmitted infections and overall dishevelled appearance

### **EMOTIONAL ABUSE**

*Actual or likely severe adverse effect on the emotional and behavioural development of a child or vulnerable adult caused by persistent or severe emotional ill treatment or rejection. All forms of abuse involve some emotional ill treatment.*

Emotional or psychological abuse can be extremely detrimental to a person's development and wellbeing. The abuser may take pleasure in frightening, undermining or humiliate the victim, or deliberately try to isolate them. Emotional abuse can also take place when a caregiver is excessively protective and prevents the person from experiencing age-appropriate events. This type of abuse is very difficult to identify as there are no physical signs and behavioural indicators can be caused by many other factors.

### **Signs to look out for:**

- Excessively negative and hostile behaviour towards the student e.g. threats, belittling, constant criticism
- Rejection, isolation or ignorance of the student
- Manipulation of the student through guilt, fear or other means
- Over-protection, limitation, excessive parental control of the student
- Exposure to distressing events e.g. domestic abuse or substance abuse
- Humiliation, scapegoating

- A lack of positive interaction: conditional love, threats to withdraw affection, consistent failure to offer support or praise

Behavioural definitions are very difficult to quantify because a) most children and young people experience some of these acts from time to time, and b) because the impact of a single or seldom occurring act of abuse will not have severe and harmful effects. The harm of emotional maltreatment results from the cumulative effects of repeated acts of psychological abuse.

## **FINANCIAL ABUSE**

*Being denied access to funds, having funds misappropriated or misused by others, being pressured or manipulated into giving money away or using it in a way the vulnerable person does not wish.*

Financial abuse occurs when a vulnerable person is exploited for someone else's personal gain. Vulnerable people may experience theft or misuse of money or possessions, be subject to fraud or scams, be pressured to share or redirect finances/resources in ways they do not wish, be prevented from accessing their money or resources, or be denied suitable care to the financial benefit of another person.

### **Signs to look out for:**

- Missing personal possessions
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person

## **INSTITUTIONAL ABUSE**

Institutional abuse occurs when the systems and practices within a setting or service either permit through neglect or actively promote the abuse of those using the service by staff or peers. Children and vulnerable adults living in institutions such as group homes or supported living environments may be at risk of institutional abuse. The abuse itself may comprise any or all of the categories detailed above (physical, emotional, sexual, financial and neglect).

### **Types of institutional abuse:**

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover, resulting in poor quality care
- Abusive and disrespectful attitudes towards service users
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to appropriately manage abusive or challenging behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to adequately support service users' medical needs e.g. not providing appropriate moving and handling support, poor upkeep of equipment such as mobility aids etc.
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

### **Signs to look out for:**

- Lack of flexibility and choice for those using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters or unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

## APPENDIX 4: VISITOR INFORMATION

### WELCOME TO GRAFHAM GRANGE SCHOOL

Nothing is more important than the safety and wellbeing of our students. We ask that you take some time to familiarise yourself with some key safeguarding points.

- Grafham Grange School is committed to safeguarding and promoting the welfare of all our students and expects all staff and visitors to share this commitment.
- Our philosophy is to always 'think the unthinkable'.
- Any visitor to the school will be accompanied at all times by a member of staff to ensure the safety and wellbeing of students.
- Be aware that we have fobbed entrances/doors to ensure the safety of our students; please be vigilant when walking through.
- We have CCTV recording in some areas of the school site for the safety of students and staff.
- We use MAPA for physical interventions, which includes positive handling techniques and de-escalation skills.
- If you have a safeguarding or child protection concern, please report this as soon as possible to one of our designated safeguarding leads (below), who will record and act, if appropriate, on the information.
- Remember that if there is a risk of immediate serious harm to a child or vulnerable adult, a referral can and should be made to social care services immediately and that anybody can make a referral.

**Our Designated Safeguarding Lead is: Steve Mitchell, Head of Care**

**Our Deputy Designated Safeguarding Leads are: Sandra Jackson and Kay Longbottom**



Steve Mitchell



Sandra Jackson



Kay Longbottom