# Safeguarding & Child Protection Policy

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# Safeguarding & Child Protection Policy

- **Important Contacts**

| ROLE / ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| **Designated Safeguarding Lead (DSL)** | Mrs Danielle Doman | ddoman@sutton.dudley.sch.uk |
| **Deputy DSLs** | Mr Ian Curnow | icurnow@sutton.dudley.sch.uk |
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| | Kelly Fellows | Kfellows@sutton.dudley.sch.uk |
| | Mr A Sant | Asant@sutton.dudley.sch.uk |
| | Miss C Taylor | ctaylor@sutton.dudley.sch.uk |
| | Mrs M Baker | mbaker@sutton.dudley.sch.uk |
| | Miss S Mascall | smascall@sutton.dudley.sch.uk |
| | Ms Angela McPherson | amcpherson@sutton.dudley.sch.uk |
| **Local Authority Designated Officer (LADO)** | Yvonne Nelson-Brown | Yvonne.Nelson-Brown@dudley.gov.uk<br>Allegations@dudley.gov.uk |
| | Sukhchandan Kaur | Sukhchandan.Kaur@dudley.gov.uk |
| **Chair of Governors** | Emma Hindle | ehindle@sutton.dudley.sch.uk |
| **Safeguarding Governor** | Heather Jeavons | hjeavons@sutton.dudley.sch.uk |

- ## Purpose and Aims

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

**Sutton School is committed to the safeguarding of ALL pupils. We ensure that:**

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

**We give special consideration to children who:**

- Have special educational needs (SEN) or disabilities. **All pupils who attend Sutton School have identified Special Educational needs and/ or disabilities, identified within their Education, Health and Care Plans (EHCP's)*
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are Children in Care or previously Children in Care
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

- **Statutory Framework**

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023) Governance Handbook in addition DfE's filtering and monitoring standards and Prevent Duty We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009,which details training and KCSIE which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- Information sharing 2018

## .1 Local Multi-Agency Safeguarding Arrangements

The school's policy has been written taken into consideration our locally agreed multi-agency procedures that have been put in place by the three safeguarding partners:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

## .2 Dudley's Safeguarding Procedures

Dudley's safeguarding procedures can be found by going to the following web pages:

- https://dudleysafeguarding.org.uk/
- https://dudleysafeguarding.org.uk/wp-content/uploads/2023/03/DSPP-Support-Level-Guidance-and-Framework-March-2023.pdf

## .3 Dudley's Safeguarding Priorities (2022-2024)

The safeguarding priorities for Dudley 2022 to 2024 are:

- Neglect
- Exploitation
- Family Safeguarding

These are detailed further on the above website and are included in whole school training.

- ## The Designated Safeguarding Lead (DSL)

Our DSL is a member of the management team:

- **Mrs D. Doman (DSL)**

Our DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. During out of school hours, the DSL (or Deputy DSL) will be contactable via the school telephone exchange 01384 818670 or alternatively, via email (as outlined on page 5 – Important contacts).

When the DSL is absent, the deputies below will act as cover.

- **Mr I. Curnow (Head Teacher)**
- **Mr D. Adams (Deputy Headteacher)**
- **Mrs K. Fellows (Assistant Headteacher and SENCo)**
- **Ms A McPherson (Family Liaison Officer)**
- **Mr A Sant (Trees Phase Leader)**
- **Miss C Taylor (Hills, Rivers Phase Leader)**
- **Miss S Mascall (Pathway Leader)**
- **Mrs Baker (Nurture Lead)**

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

- Work closely with teachers and share information & provide advice and support to other staff on child welfare and safeguarding and child protection matters
- Set out procedures so that staff promptly share their safeguarding concerns in writing
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.
- Refer cases where a crime may have been committed to the Police
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children, particularly in relation to Early Help
- Work closely with Mental Health Leads
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Panel, Disclosure and Barring Service and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour

- Have a good understanding and takes the lead of the filtering and monitoring systems and processes in place at our school, this is included in the DSL's job description

Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

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

- **The Headteacher, Governing Body, Trustees and Proprietors**

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

- Ensuring that staff (including temporary & supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Complete appropriate safeguarding and child protection (including online) training

**The Governing body, Trustees or Proprietors will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation**.

The Governing Body have appointed a senior board level **Safeguarding Governor (Heather Jeavons**) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The **Chair of Governors (Emma Hindle)** will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).

- Ensure that the school has appropriate filtering and monitoring systems in place. At Sutton we use RM for filtering and Smoothwall for monitoring. We continue to review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these

standards

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

All Governors have read and understood Keeping Children Safe in Education 2024. (Part Two of this policy has information on how governors are supported to fulfil their role.)

- **Safeguarding Policies and Procedures/Legal Responsibilities and Duty to Share Information**

**Our safeguarding responsibilities include:**

- 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.

Child protection refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Children includes everyone under the age of 18.

Three Safeguarding Partners as identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated Care Boards
- The chief officer of police for a police area in the LA area

**Our roles and responsibilities include:**

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Sutton School plays a crucial role in preventative education by embedding safeguarding and well being in the school curriculum.

## .1 All Staff

- Will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed, understand, and will follow the guidance. **This is evidenced on Bluesky electronic systems where all staff are able to update CPD and complete the appropriate and necessary training logs.**
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)
- All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Behaviour/ Code of Conduct Policy, the role and identity of the designated safeguarding lead (DSL) and deputies.
- The behaviour policy
- Online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring,] and the safeguarding response to children who go missing from education.
- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child exploitation (CSE/CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- What to look for to identify children who need help or protection.

.1.1 Staff Safeguarding Training

- All staff members will undertake safeguarding and child protection training, online safety training including IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with local and statutory guidelines.
- All staff will undertake annually training on Cyber-security training.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment.
- Have a clear understanding of the needs of all pupils.
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates including online safety, as required but at least annually. Regular updates throughout the academic year could include (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

**.2 Volunteers and Contractors**

All volunteers and contractors will receive appropriate training, as applicable.

All visitors will be required to verify their identity to the satisfaction of staff.

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

Visitors are expected to sign into school via our electronic Inventory system and wear a visitor's badge at all times. These are colour coded so staff and pupils are aware of which staff can be un supervised.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

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

**.3 The DSL and Deputy / Deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. Online safety training will be undertaken annually and regularly updated to keep knowledge of staying safe online and the risks associated up to date, this includes including filtering and monitoring and cyber security

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent Awareness training at least every two years.

.4 **Governors**

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the chair of governors, **Emma Hindle**, may be required to act as the 'case manager' if an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

All Governors will undertake training relating to online filtering and monitoring, in addition one Governor will be trained in Cyber-security.

- ## Confidentiality

Confidentiality is an issue, which needs to be discussed and fully understood by all those working with children at The Sutton School, particularly in the context of Child Protection. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information is stored in a secure place with restricted access to designated people and is maintained in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

**Key Factors:**

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 10.

**For any schools, not providing pupils' personal data where the serious harm test under the legislation is met.** For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

- ## Communication with Parents

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

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

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

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

We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

- ## Whole Staff Responsibilities

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

### .1 If a Child is Suffering or Likely to Suffer Harm, or in Immediate Danger

We will make a referral to Multi Agency Support Team relevant to the child's home address, for Dudley children this is Dudley Front Door and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL/DDSL as soon as possible if you make a referral directly.

***Dudley Report it*** page: https://dudleysafeguarding.org.uk/

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. This should be done using the School Safeguarding System – https://specialsutton.cpoms.net
- If this ICT system cannot be accessed, this should be done in paper format and signed and dated with the time added before being passed on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.

Aside from the above professionals, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

It is important to also understand the following:

- The child may not feel ready, or know how to tell someone that they are being abused,

exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

- ## Record Keeping

**At Sutton School**

- We will hold records in line with our records retention schedule.
- All safeguarding concerns (including low level concerns), discussions, decisions made and the reasons for those decisions, must be recorded in writing and held in CPOMS or the child's Safeguarding File within school. If you are in any doubt about whether to record something, discuss it with the DSL.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. These are held separately to all other files and are accessible to the Safeguarding Team. Electronic Records are held in CPOMS and are checked / acted upon by Safeguarding Team members.
- Safeguarding records relating to individual children will be retained in line with the school's data retention policy.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely, within 5 school days of starting at the new education setting, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information (using the pupil safeguarding form) to enable them to have time to make any necessary preparations to ensure the safety of the child.
- Allegations/concerns raised to the Head Teacher regarding members of staff should be recorded in writing and submitted to the Head Teacher.

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

*Figure* 1 ***(page 18)*** **illustrates the procedure to follow if you have any concerns about a child's welfare.**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by completing a Request for Advice and Support Children's Services Portal site or contact 0300 555 0050.

To refer into Dudley Exploitation hub (DEx): CS.Hub@dudley.gov.uk also complete a Request for Support and Advice Form to be submitted via the portal.

Make a referral to Local Authority Children's Social Care directly, if appropriate (see '.1 Referral').

Share any action taken with the DSL as soon as possible.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

**.1 Referral**

If it is appropriate to refer the case to Local Authority Children's Social Care or the Police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Advice and further information on Dudley Professional Resolution can be accessed from the Lead for Safeguarding in Education or directly of the Dudley Safeguarding partnership website.

*Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) - (Note – if the DSL is unavailable, this should not delay action.)*

- ## Thresholds and Early Help

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

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

Level 1 - No referral is required. Professionals should contact Dudley's Family information Service on 01384 814398 to obtain universal information about support available for children, young people and families.

Dudley Safeguarding Partnership threshold guidance is below, this should be considered when completing Request for Help and Support Form

https://dudleysafeguarding.org.uk/wp-content/uploads/2023/03/DSPP-Support-Level-Guidance-and-Framework-March-2023.pdf

- ## When to be Concerned

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) **sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse),** criminal exploitation, serious youth violence, county lines and radicalisation.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. **Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse**. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Signs and Symptoms of Abuse**

### Definitions and Indicators of Abuse and Exploitation

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
All staff should be aware of the indicators of abuse, neglect and exploitation (see below),

understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

There are four types of child abuse. They are defined in Part 1 of the UK Government guidance Keeping Children Safe in Education; statutory guidance for schools and colleges, September 2025 as follows:

Physical Abuse
Emotional Abuse
Sexual Abuse
Neglect

## Physical Abuse

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

## Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation or exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone

## 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 production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation

for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## Neglect

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

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

**Exploitation:** a form of abuse where a child is manipulated, coerced, or deceived into situations that are harmful to their well-being. This can include situations where a child is used for criminal activity, sexual activity, or other harmful purposes. Exploitation can occur both online and offline, and it's crucial for adults to be aware of the signs and indicators of exploitation to ensure children are protected.

## Significant Harm

"Significant Harm is any Physical, Sexual or Emotional Abuse, Neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life. Harm is defined as the ill treatment or impairment of health and development."

## Signs of Abuse

Recognising child abuse is not easy. It is every staff member's responsibility to be alert to whether or not child abuse has taken place or if a child is at significant risk of harm from someone. The following information should help to recognise the signs of possible abuse.
The physical signs of abuse may include:
unexplained bruising, marks or injuries on any part of the body;
multiple bruises - in clusters, often on the upper arm, outside of the thigh;
cigarette burns;
human bite marks;
broken bones;
scalds, with upward splash marks;
multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:
fear of parents being approached for an explanation;
aggressive behaviour or severe temper outbursts;
flinching when approached or touched;
reluctance to get changed, for example in hot weather;
depression;
withdrawn behaviour;
running away from home.
Changes in behaviour which can indicate emotional abuse include:
neurotic behaviour e.g. sulking, hair twisting, rocking;
being unable to play;
fear of making mistakes;
sudden speech disorders;
self-harm;
fear of parent being approached regarding their behaviour.

## Domestic Abuse

The definition of Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who

are, or have been, intimate partners or family members regardless of gender or sexuality. 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 7 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.

At Sutton, we work we other key partners and share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm. This can encompass, but is not limited to, the types of abuse within the following guidance:

NSPCCC:UK Domestic abuse signs, symptoms, effects

Refuge: What is domestic violence/effects of domestic violence on children

SafeLives: Young people and domestic abuse

- 

## Psychological, Physical, Sexual, Financial and Emotional

Controlling behaviour is: A range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: An act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

## Positive Mental Health, Well-being & Resilience

Positive mental health is the concern of the whole community and recognise that schools play a key part in this. Our school wants to develop the emotional well-being and resilience of all pupils and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors, which increase someone's vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counterbalance and promote further growth of resilience.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Sutton staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the Designated Safeguarding Lead or a deputy.

Sutton also delivers a resilience curriculum to all Key Stage 3 and 4 pupils as part of their learning and development.

## Online Safety

The government has published a guidance document 'Teaching online safety in school

(DfE, June 2019). It outlines to schools the importance of helping children and young people not only to use the internet safely, but also to give them opportunities to learn how to behave online. At Sutton our staff are made aware of the importance of teaching that is always age and developmentally appropriate.
Teaching online safety in school says that there are many areas in the curriculum where the topics could be taught, not least in the compulsory Relationships (Sex Education) and Health Education in place from September 2026. In these curriculum areas, pupils will be taught what positive, healthy and respectful online relationships look like. The guidance includes the following underpinning knowledge and behaviours:
How to evaluate what pupils see online
How to recognise techniques used for persuasion
Online behaviour
How to identify online risks
How and when to seek support

Although the nature of online harms is discussed within the curriculum, it is not until we look through the comprehensive risk in this document that they together they reflect how harmful the internet might be. It is easy to see the potential harms, but it important that we communicate them in a safe and beneficial way, so
that pupils remain respectfully cautious and not fearful. Potential harms covered in the guidance include:
Age restrictions
Content: How it can be used and shared
Disinformation, misinformation and hoaxes
Fake websites and scam emails
Fraud (online)
Password phishing
Personal data
Persuasive design which keeps 'users online for longer than they might have planned or desired'
Privacy settings
Targeting of online content
Abuse (online)
Challenges [to do something and post about it]
Content which incites…hate, violence
Fake profiles
Grooming
Live streaming
Pornography
Unsafe communication
Impact on confidence (including body confidence)
Impact on quality of life, physical and mental health and relationships
Online vs. offline behaviours
Reputational damage
Suicide, self-harm and eating disorders
The Teaching online safety in school guidance, reminds us that when teaching about these safeguarding topics (and others), staff should be mindful that there may be a child

or young person in the lesson who is or has been affected by these harms. During or after a lesson, a pupil may be prompted to disclose about something that may have happened online. The guidance says that it is good practice to consult the Designated Safeguarding Lead 'when considering and planning any safeguarding related lessons or activities (including online) as they will be best placed to reflect and advise on any known safeguarding cases, and how to support any pupils who may be especially impacted by a lesson'. Teaching online safety in school should be read in conjunction with Education for a Connected World Framework (UKCIS, 2020) which offers 'age specific advice about the online knowledge and skills that pupils should have the opportunity to develop at different stages of their lives.'

The Teaching online safety in school guidance emphasises the need for a whole school approach so that it is embedded in everything the school does including:
Creating a culture that incorporates the principles of online safety across all elements of school life
Proactively engaging staff, pupils and parents/carers
Reviewing and maintaining the online safety principles
Embedding the online safety principles
Modelling the online safety principles consistently.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers the school to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:
**content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
**commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk, it can be reported to the Anti-Phishing Working Group (https://apwg.org/).

## Using AI safely and effectively

Any use of generative AI by staff and students will be carefully considered and assessed, evaluating the benefits and risks of use in school.
The intended use should be specified and have clear benefits that outweigh the risks. Different considerations will apply depending on whether it is staff or students using AI tools.

Safety will not be compromised. The schools will consider whether there may be uses of generative AI by staff or pupils that have not been explicitly approved or adopted in their setting.
Risk assessments will include plans for mitigating against unauthorised use cases. For example, students may use generative AI to create emails from the school to parents that seem realistic.
Students should only be using generative AI in school with appropriate safeguards in place, such as close supervision and the use of tools with safety and filtering and monitoring features.
For any use of AI, the school will:

- comply with age restrictions set by AI tools and open access LLMs
- consider online safety, including AI, when creating and implementing safeguarding related policies and procedures
- consult Keeping children safe in education
- refer to the DfE generative AI product safety expectations
- refer to the DfE filtering and monitoring standards to make sure appropriate systems are in place, including filtering and monitoring approaches that cover generative AI
- review how to strengthen cyber security by referring to the DfE guidance on cyber security standards for schools and colleges – generative AI could be used to increase the sophistication and credibility of attacks
- refer to the DfE plan technology for your school service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them

## The Sending of Indecent Images from One Person to Another through Digital Media Devices

The school accepts that this is a safeguarding concern and one that is increasing which requires a robust response. We will seek advice from agencies and professionals acknowledging that there are both national and local guidance that we need to adhere to in order to tackle the concerns and work in partnership with our agencies.

We will refer to:

The DfE guidance 2023 on Searching Screening and Confiscation Advice for Schools and Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024)
UK Council for child internet safety and our school policy relating to mobile phones in school.

**.1 County Lines**

As set out in the Serious Violence Strategy published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing

areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. This activity can happen locally as well as across the UK; no specified distance of travel is required. For further information see 'Criminal exploitation of children and vulnerable adults: county lines' .

Some of the signs that a child is exploited by county lines include:

- absent from school or missing from home
- disengaged from their usual friendship groups
- have new friends (especially older or unknown)
- have a new phone or multiple phones
- have new clothes or unexplained money
- spend more time than usual online or taking calls
- become secretive

- ## Specific Safeguarding Issues

Sutton School is committed to safeguarding and promoting the welfare of all children and young people both within the school environment and outside. Because of the day-to-day contact with children and young people, education staff are particularly well placed to observe outward signs of abuse, changes in children's behaviour or their failure to develop. It is therefore important; 'to be alert to the possibility of abuse occurring, be aware of the procedures to be followed if you have suspicions and have the confidence to follow those procedures.' This policy applies to all staff, governors and volunteers working in the school.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

Sutton School is a special school for pupils with complex needs aged 11-16, all of whom are vulnerable. Staff arrangements are in place to meet the needs of all children in school which promotes their safety. In addition, there are numerous ways in which the safety and dignity of pupils are prioritised, including:

- The safe storage, administration and recording of prescribed medication by qualified first aiders in school (further details in our Medicines Policy).
- Rigorous training, which is updated annually for staff in hoisting, minibus wheelchair clamping, Diabetes, epilepsy, asthma and anaphylaxis.
- Personal plans for individual pupils for Intimate Care, medical conditions, site evacuation, risk assessment of the school site, trips, evacuation, all in addition to group/class plans.

### .1 Child on Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

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

Child on child abuse can include the following:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Most cases of pupils/students hurting other pupils/students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils/students in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, ***up skirting*** [1] or sexually inappropriate pictures or videos (including sexting)

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the Local Authority Children's Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate

**We will minimise the risk of Child-on-Child abuse by**:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by informing them through assemblies, posters and through our curriculum.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

**.2 Consensual and Non-Consensual Sharing of Indecent Images**

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for all staff 2017 and for DSLs and senior leaders.

**.3 Your Responsibilities When Responding to an Incident**

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

**Staff will always explain to students that ALL incidents will be reported. They will reassure the pupil(s) that they will receive support and help from the DSL. This could include the following:**

.3.1 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- 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 (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

.3.2 Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

.3.3 Informing parents

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

.3.4 Referring to the police

If it is necessary to refer an incident to the police, this will be done through:

- Police 999 or 101 - 8513087 (PC Andy Peters)
- Child Abuse Investigation Unit 101 or 0345 113 5000

.3.5 Recording incidents

All Sharing of nudes/semi-nude incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in *section* · of this policy also apply to recording incidents.

Through Core Studies this approach is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

**.4 Female Genital Mutilation**

.4.1 If You Discover That FGM Has Taken Place or a Pupil is at Risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises *'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'*

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

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

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

## .5 Honour Based Abuse (Including Forced Marriage)

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

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

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

## .6 Forced Marriage

Implementation of the Marriage and Civil Partnership (Minimum Age) Act 2022

It is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

Forcing a person into marriage is a crime. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological.

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

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

**The DSL will:**

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## .7 Child Criminal Exploitation

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

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

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

**Indicators of CCE can include a child:**

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Involved in gangs and knife crime
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

**.8 <u>Child Sexual Exploitation</u>**

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

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

## .9 Children Who Are Missing from Education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who 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 going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

For further information, see the Children Missing Education statutory guidance for local authorities 2016:

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf
- https://www.gov.uk/government/publications/working-together-to-improve-school-attendance

## .10 Missing Pupils

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. School and college staff should follow the school's or college's procedures for dealing with children 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.

The Sutton School has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions.

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

- Notify the Head Teacher, Inform Parents and all relevant agencies immediately (police, social care etc) and as a matter of urgency.
- Review all safeguarding procedures that has led to this incident without delay.

With regards to other issues of a child missing from education, The Sutton School will inform the local authority of any pupil who is going to be deleted from the admission register where they:

- Have been taken out of the school by their parents and are being educated outside the school system e.g. home education;
- Have ceased to attend the school and no longer live within reasonable distance of the school at which they are registered;
- Have been certified by the school medical officer as unlikely to be in a fit state of health to attend the school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- Have been permanently excluded.

All staff are 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, Female Genital Mutilation and forced marriage.

The school will inform the local authority of any pupil who fails to attend the school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

The school puts significant emphasis on attendance and closely monitors all pupils attendance, contacting home when a student is absent. The school will hold at least two emergency contacts for each student.

## .11 Homelessness

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

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

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

## .12 Domestic Abuse

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

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

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

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

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

## .13 Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable, see Part Five of KCSiE 2025.

### .13.1 Responding to Reports of Sexual Violence and Sexual Harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

Ultimately, the school will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

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

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

**When supporting victims, staff will:**

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

**Staff should be aware of the importance of:**

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures within school ensuring that the DSL is informed immediately.

## .14 Radicalisation and Extremism

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

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

**Terrorism** is an action that:

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

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

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

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

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

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

Dudley's LA Prevent Officer is Mark.Wilson@dudley.gov.uk

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our Prevent risk assessment and reporting procedures including discussing their concerns with the DSL.

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

Sutton School values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Our school, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead.

The SPOC for The Sutton School is Mr D Adams.

**The SPOC is responsible for:**

- Ensuring that staff of the school are aware of who is the SPOC in relation to protecting students from radicalisation and involvement in terrorism
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism
- Raising awareness about the role and responsibilities of the school in relation to protecting students from radicalisation and involvement in terrorism
- Monitoring the effect in practice of the school's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs
- Raising awareness within the school about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism
- Acting as the first point of contact within the school for case discussions relating to students who may be at risk of radicalisation or involved in terrorism
- Collating relevant information from/ in relation to referrals of vulnerable students into the Channel project process
- Attending Channel project meetings as necessary and carrying out any actions as agreed
- Reporting progress on actions to the Channel** Co-ordinator, and
- Sharing any relevant additional information in a timely manner

.14.1 <u>If you have concerns about extremism</u>

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

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

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

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

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

## .15 Mental Health

### .15.1 If You Have a Mental Health Concern

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

Our school's Mental Health Lead is: **Mrs D. Doman**

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action.

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

Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in school's guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people. Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

## .16 Areas With Particular Risk (Not Exhaustive)

Further School Policies can be requested from School:

- Physical intervention
- Personal/Intimate care
- Changing for PE and swimming
- 1:1 working
- Host families
- Private Fostering
- School dogs/therapy dogs
- Pupils being taught off site
- Elective Home Education (EHE)
- Children persistently absent or have episodes of missing
- Young carers
- Children of parents with mental health issues
- Children and the court system
- Children with family members in prison

- ## LGBT+ Pupils

Some pupils/students may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, bi-phobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness.

Several studies also evidence that LGBT+ young people may be at increased risk of becoming victims of CSE.

Schools should therefore ensure that they are aware of the increased risk factors and know how to access appropriate support for these young people when required.

- ## Online Safety and the Use of Mobile Technology

See KCSiE 2025, Annex A but also refer to the schools' separate Online Safety & Social Media Policy as well as:

- Teaching Online Safety in Schools (updated January 2023)

  https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools

- Education for a connected world (2020 Edition) A Framework to equip young people in digital life.

  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS_Education_for_a_Connected_World_.pdf

### .1 The 4 Key Categories of Risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

At the Sutton School a whole school approach is taken to online safety. We endeavour to ensure appropriate filters and appropriate monitoring systems are in place. Our Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education (PSHE) and sex and relationship education (SRE).

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material.

Whilst we ensure that appropriate filters and monitoring systems are in place, we are mindful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding. Child acceptable user policies are in place drawn up with pupils to ensure safe access to the internet at all times.

**.2 Opportunities to teach safeguarding**

At The Sutton School children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum. This may include covering relevant issues for schools through Relationships and Sex Education and Health Education.

**.3 Mobile phones and cameras**

For further information on the use of mobile phones, cameras and sharing of images please see our e-safety policy and our Acceptable Use policy.

We recognise that personal mobile phones have the potential to be used inappropriately and therefore the school has developed a policy to outline the required protocol for all employees, pupils, volunteers, governors and parents/ carers. Staff, volunteers, parents must not use personal phones or devices to take pictures of pupils at any time, even when on educational visits.

Sutton School has appropriate internet filtering and monitor all activity accordingly. Please see our e-safety policy for further information.

The latest searching, screening and confiscation guidance for schools can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching__Screening_and_Confiscation_guidance_July_2022.pdf

See also, the latest guidance on teaching online safety in schools:

https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools

- ## Children in Care (CiC) and Post Children in Care

Designated person should aim to work in partnership with the Virtual School Coordinator on how funding can best support the progress of a CiC. The name of the Virtual Headteacher is Emma Thomas Emma.Thomas@dudley.gov.uk

We will ensure that staff have the skills, knowledge and understanding to keep Children in Care and previous Children in Care safe. We will ensure that:

- Appropriate staff have relevant information about Children in Care's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher**, Danielle Doman,** who is responsible for promoting the educational achievement of Children in Care and previous Children in Care in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and

experience to perform the role.

**As part of their role, the designated teacher will:**

- Work closely with the DSL to ensure that any safeguarding concerns regarding Children in Care and previous Children in Care are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of, Children in Care and previous Children in Care, including discussing how pupil premium plus funding can be best used to support CiC and meet the needs identified in their personal education plans

- ## Pupils/Students with a Social Worker

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

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

- ## Children with Special Educational Needs and Disabilities

We recognise that all pupils within our setting have special educational needs (SEN) and disabilities, they can therefore face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect, including:

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

- ## Safer Recruitment Procedure

### .1 Recruitment and Selection Process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2024.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

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

## .2 Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children which is encompassed within our Sutton School motto: Safe > Happy > Learning towards independence.
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

## .3 Application forms

Our online application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## .4 Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

## .5 Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

## .6 Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

## .7 Pre-appointment vetting checks

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

## .8 New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher or anyone involved with teaching work as set out in KCSIE.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

## .9 Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## .10 Agency and third-party staff

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

## .11 Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

## .12 Trainee/student teachers

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

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

**.13 Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

**.14 Governors**

- All governors will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).
- All governors will have the following checks:
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

## Alternative Provision

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and school leaders are aware of the additional risk of harm that students may be vulnerable to. We will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that we would otherwise perform on our own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure that appropriate safeguarding checks have been carried out on new staff.

The school should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

The DfE has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

• Alternative Provision - DFE statutory guidance
• Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk) – DFE statutory guidance.

- ## Procedure for Dealing with Allegations About Staff

### .1 Concerns About a Staff Member, Supply Teacher or Volunteer (or Governor)

If you have concerns about a member of staff (including a supply teacher, governor, or volunteer), or an allegation is made about a member of staff (including a supply teacher governor or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

For the procedure for dealing with complaints and allegations about staff – See Part Four of KCSiE and also refer to our staff behaviour policy/code of conduct.

Schools must work with other agencies to investigate when a member of staff has **"behaved or may have behaved in a way that indicates they may not be suitable to work with children''**.

## .2 Duties as an Employer and an Employee

This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers 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.

Further guidance on how schools and colleges should handle allegations against supply staff & volunteers, has been added and handled accordingly.

The responsibility to manage allegations about supply teachers is made clear, so they still ensure allegations are dealt with appropriately when they are not the employer. Schools cannot simply cease to use this teacher. Processes should be developed to manage this akin to the disciplinary procedure and the school should advise supply agencies of its process for managing allegations.

Any concerns about the conduct of other adults in the school should be taken to the Headteacher (NOT to DSL, unless DSL is also the Headteacher).

## .3 Procedure for Dealing with Complaints and Allegations About the Headteacher or Proprietor

Concerns about the Headteacher should go to the Chair of Governors. (In proprietor-led independent schools, concerns about the proprietor(s) directly to the local authority Designated Officer (LADO).

**LADO is Yvonne Nelson-Brown** Yvonne.nelson-brown@dudley.gov.uk

The policy should be clear about the steps the DSL should take in order to refer a concern outside the school, e.g. a social services enquiry or to LADO.

## .4 Procedure for Dealing with Staff Concerns That do not Meet the Harm Threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

- As part of our whole school approach to safeguarding, Sutton School promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including 101 supply teachers, volunteers and contractors) are dealt with promptly and appropriately.
- We create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, understanding that this is critical.
- Implemented correctly, this will:
    - enable us to identify inappropriate, problematic or concerning behaviour early
    - minimise the risk of abuse, and
    - ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our institution.

.5 **Sharing Low-Level Concerns**

All low-level concerns are shared initially with the DSL and or headteacher. If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some the headteacher/principal may wish to consult with the DSL and take a more collaborative decision-making approach.

- Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.
- School will always consult with the LADO if in doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold.
- Sutton School strives to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves 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.

.6 **Recording Low-Level Concerns**

All low-level concerns should be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken
- the name of the individual sharing their concerns should also be noted (if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

These records are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).440. Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college 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.

**Records are retained at least until the individual leaves their employment.**

- ## Whistleblowing

All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and concerns will be taken seriously by the senior leadership team. Please refer to the school's separate Whistleblowing Policy. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff policies, are in place for such concerns to be raised with the school's senior leadership team. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, staff may seek free confidential help from the independent charity, Public Concern at Work, Tel: 0207 404 6609 or through whistle@pcaw.co.uk

- ## Special Circumstances

Further School Policies can be requested from School or found on the School Website:

- Behaviour
- Staff (behaviour/code of conduct)
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- GDPR
- Whistleblowing
- Safer Recruitment
- Anti-bullying
- IT / Acceptable Use policy

- ## Complaints Procedure

For further information on our school complaints procedure, please contact our school administration team or access this document via our school website:

- https://static1.squarespace.com/static/61542f6a4fc0d03f70afa50b/t/6447eef7df885f7abae5c8b1/1682435833230/Sutton_General_Complaints_Policy.pdf.pdf