File:	Safeguarding Policy
H/B ref:	6.5i
Updated:	01/2025 HSc

Copthill School

Child Protection & Safeguarding Policy 2024/2025

Person Responsible for Policy: Jonathan Teesdale (Safeguarding Director)

Headteacher: Helen Schofield

This policy is applicable to all pupils in the school including Early Years Foundation Stage

Academic year	**Designated Safeguarding Lead, including EYFS**	**Deputy Designated Safeguarding Leads**	**Safeguarding Director**	**Advisory Panel Member**
2024-25	Helen Schofield *07527 859853*	Rachel York-Forward *01780 757506*	Jonathan Teesdale *07801 585301*	Margaret Miles *07729 053717*

The named personnel with designated responsibility regarding allegations against staff or Directors are:

Designated Senior Manager - Headteacher	**Safeguarding Director** (in the event of an allegation against the Headteacher)	**Advisory Panel Member**
Helen Schofield *07527 859853*	Jonathan Teesdale *07801 585301*	Margaret Miles *07729 053717*

Designated Teacher for Children in Care and Children Previously in Care (Looked after children and previously looked after children)	**SENDCo**
Anne Teesdale	Rachel York-Forward

Policy review dates (No later than one year following publication of the policy)

Review Date	Changes made	By whom	Date Shared
September 2024	-	Helen Schofield	04/09/2024
January 2025	Highlighted in yellow	Helen Schofield	13/01/2025
Next Review Date			
September 2025			

DSL/Headteacher	
Safeguarding Director	
Director	
Director	
Director	
Advisory Panel Member	

Definition:

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes –

Working together to safeguard children 2023

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Rationale:

We recognise the responsibility we have under Section 157 (Academies and Independent Schools) of the Education and Inspections Act 2002 to have arrangements for safeguarding and promoting the welfare of children. The Directors approve the S157 on a yearly basis. This policy demonstrates the school's commitment and compliance with safeguarding legislation.

Through their day-to-day contact with pupils and direct work with families, staff at our school have a crucial role to play in noticing indicators of possible abuse, neglect and exploitation and referring them to Children's Services in Lincolnshire or neighbouring authorities dependent upon the child's area of residence. The relevant local authority LSCP procedures will be followed.

Introduction:

The aims of these procedures are:

- to clarify roles and responsibilities of everyone within our school in relation to child protection and safeguarding;
- to have clear procedures that are followed when a child is identified as needing more than universal services can provide.

The term "child "or "children" refers to anyone under the age of 18 years.

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Section 1 School Commitment

This policy applies to all adults, including volunteers, working in or on behalf of the school.

At Copthill School, we are committed to safeguarding and promoting the well-being of all our children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children to talk to us about anything that worries them. We will always act in the best interest of the child. Staff should share any concerns they have about a child with the Designated Safeguarding Lead (DSL). However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

Pupils are taught about how they can keep themselves and others safe, including online, through various teaching and learning opportunities as part of a broad and balanced curriculum - for example, through Relationships Education; Personal, Social, Health and Economic (PSHE) Education; assemblies; lessons and activities focusing on online safety; workshops provided by Lincolnshire County Council's Safer Communities Service and when circumstances arise that give an opportunity for discussion. To be effective, we present this information in an age-appropriate way.

For example, units of work in our PSHE Education programme focus upon:

- Health
- Healthy Lifestyles
- Hygiene
- Changing and Growing
- Emotions
- Safety
- Communication
- Bullying
- Fairness
- Family and Friends
- Rules and Responsibilities
- Communities
- Economic Awareness
- Nutrition and Food
- Aspirations
- First Aid
- Collaboration
- Similarities and Differences
- Healthy Relationships
- Diversity
- Discrimination
- Enterprise
- Extremism and Radicalisation
- Sex and Relationships

We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Each pupil's welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse. We also recognise that children who are abused, neglected or exploited may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at school, behaviour may be challenging. We recognise that they may exhibit concerning behaviours and at times this may impact on other children either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all of our pupils. We are committed to putting the child at the heart of any procedures that operate.

We recognise that safeguarding concerns do not adhere to school/home boundaries and that what happens at home and within the wider school environment, including online, is as relevant as what happens within the classroom..

We aim to work in partnership and have an important role in inter-agency safeguarding arrangements as set out by *Working together to safeguard children 2023* and *Keeping Children Safe in Education 2024*. Everyone working in or for our school shares an objective to help keep children and young people safe by contributing to:

- providing a safe environment for children and young people to learn and develop in our school setting, and
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both within and outside of our school setting
- creating a whole school approach to safeguarding through a culture of care where children are listened to, and heard, with the knowledge that their concerns and worries will be taken seriously.

Before & after school activities and extended school

Copthill provides extended school facilities, including before and after school activities, directly under the supervision and management of school staff. Arrangements for safeguarding children and young people as written in this policy will apply.

Where services or activities are provided for Copthill pupils separately by another body, Copthill School ensures that relevant checks have been carried out through obtaining written confirmation from the employer of the third party. The relevant minimum checks always include:

- barred list check for those in regulated activity;
- appropriate level of DBS check;
- identity check on arrival;
- any other role-specific checks, where applicable, e.g. disqualification from childcare.

Out of school providers

Copthill School hosts out-of-school providers on our premises which involve children who do not attend our school. Whilst the providers are responsible for their own safeguarding and child protection policies and procedures, Copthill School will follow our own safeguarding and child protection procedures if there are concerns about the provider. This may include contacting the Local Authority Designated Officer (LADO) in the case of concerns about adults.

Refer to After-school clubs, community activities and tuition: safeguarding guidance for providers

Visitors

Visitors to our school are provided with our Safeguarding Advice Leaflet on arrival and are asked to read it.

Human Rights Act 1998

We recognise that the Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific Convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: all of the rights and freedoms set out in the Act must be protected and applied without discrimination and
- Protocol 1, Article 2: protects the right to education.

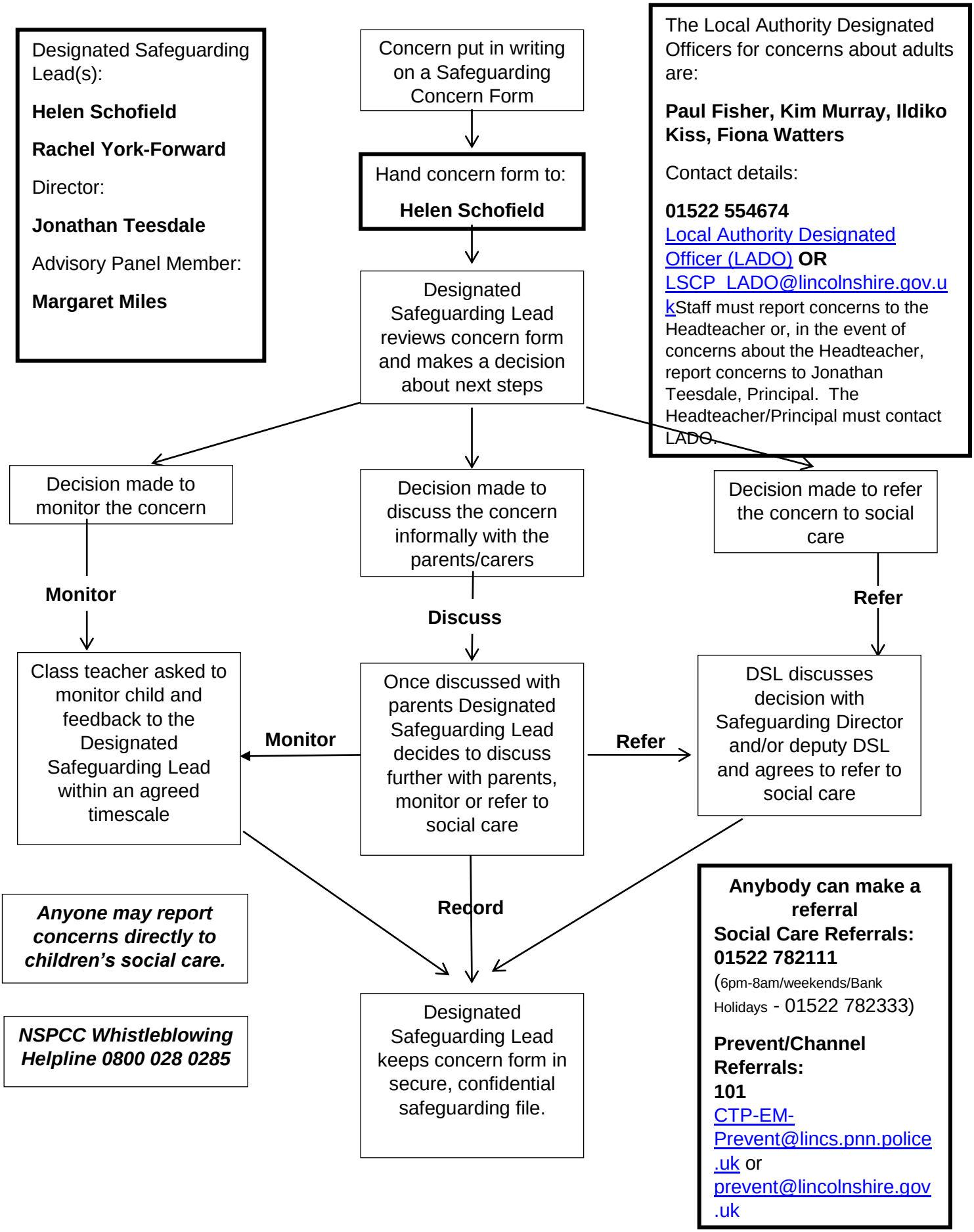
Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Equality

We also recognise our obligations under the Equality Act 2010: advice for schools that we must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). In relation to safeguarding and promoting the welfare of children, we will carefully consider how we are supporting our pupils with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Awareness of our obligations under the Human Rights Act 1998 and Equality Act 2010 is particularly important for those children with SEND.

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



2.1 Definitions: *Working together to safeguard children 2023* and *Keeping Children Safe in Education 2024*

A child: any person under the age of 18 years.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Development means physical, intellectual, emotional, social or behavioural development.

Health includes physical and mental health.

Maltreatment includes sexual abuse and other forms of ill-treatment which are not physical.

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 another child or children.

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

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

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

abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff follow the school's Child Protection Procedures which are consistent with *Working together to safeguard children 2023* and *Keeping Children Safe in Education 2024* and the Lincolnshire Safeguarding Children Partnership guidance.

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse and/or school staff being alerted to concerns.

All staff will also have an awareness of specific safeguarding issues as referred to in section 5, in particular Domestic Abuse, Child Exploitation (CE), Radicalisation and the Prevent Duty, Female Genital Mutilation (FGM), Attendance and Children who are Absent from School and Contextual Safeguarding. Staff will also be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff will also be aware that safeguarding issues can manifest themselves via child on child abuse, including online. This is most likely to include, but not limited to, bullying (including online bullying), gender based violence/sexual assaults and sexting. Children can also abuse other children online through, for example, abusive, harassing and misogynistic/misandrist messages; the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. Staff are clear as to the school's policy and procedures with regards to child on child abuse.

It is ***not*** the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All members of staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly all concerns regarding the welfare of pupils will be recorded and discussed with the DSL (or the deputy DSL in the absence of the DSL) prior to any discussion with parents. The DSL or deputy should seek advice from the relevant Children's Services Customer Service centre if they are unsure of what action to take.

If children are placed in any form of Alternative Provision for any part of their school day, Copthill School continues to be responsible for the safeguarding of the children and should be satisfied that the placement meets the pupil's needs. Copthill School will seek reassurance that the same child protection procedures will be followed and that any concerns will likewise be reported to our DSL and their counterpart within the Alternative Provision.

2.2 Concerns that staff must act on immediately and report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the expected knocks or scrapes received in play;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play);
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;

- any concerns that a child is presenting signs or symptoms of abuse, neglect or exploitation;
- any significant changes in a child's presentation, including non-attendance;

- any hint or disclosure of abuse from any person;
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present);
- any potential indicators of Child Exploitation;
- any potential indicators of FGM;
- any potential indicators of Radicalisation;
- any potential indicators of living in a household with Domestic Abuse.

When staff or other adults in the school have a concern about a child, they should:

- in writing, record an outline of the concern and the date in a 'Safeguarding Record of Concern' booklet and hand to the DSL or a deputy.
- Record any visible signs, injuries or bruises on a Body Map. Guidelines on using a Body Map are included on the form. At no time should photographic evidence of any injuries or marks to a child's person be taken as this type of behaviour could lead to the staff member being taken into managing allegation procedures.
- The 'Safeguarding Record of Concern' booklet should be filled in as soon as is practicable and certainly within 24 hours.
- 'Safeguarding Record of Concern' booklets can be found in the main school staffroom, Early Years staffroom and office area of the Music Room.
- If the Designated Safeguarding Lead & Deputies are not available, contact Jonathan Teesdale (Safeguarding Director 07801 585301), a member of the SLT and/or take advice from children's social care. Reporting suspicion of child abuse should not be delayed. The DSL should be informed as soon as possible.

2.3 Responding to disclosure – see flowchart above (p8) and Appendices 2 and 3

All information and actions taken, including the reasons for any decisions made, will be fully documented and **the process depicted in the flowchart on page 8 and in Appendix 3 will be followed**. All referrals to Customer Service Centre will be followed up in writing and these referrals will always be kept on file irrespective of the outcome.

Staff will not investigate nor ask any leading questions but will, wherever possible, elicit enough information to pass on to the DSL in order that she can make an informed decision of what to do next.

It should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

The DSL will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Child protection processes will operate with the best interests of the child at their core.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm;
- try to ensure that the child or person disclosing does not have to speak to another member of school staff;
- clarify the information;
- try to keep questions to a minimum and of an 'open' nature e.g. using TED technique – 'Tell me. Explain to me. Describe to me.' See Appendix 2.
- try not to show signs of shock, horror or surprise;
- not express feelings or judgements regarding any person alleged to have harmed the child;
- explain sensitively that they have a responsibility to refer the information to the DSL; children need to know that staff may not be able to uphold confidentiality where they are concerns about their safety or someone else's;
- reassure and support the child as far as possible – reassure them that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the

impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment (see section 7.17) and no victim ever be made to feel ashamed for making a report;
- explain that only those who 'need to know' will be told;
- explain what will happen next and who will be involved as appropriate;
- record the context and content of their involvement, and distinguish between fact, opinion and hearsay;
- in writing, record details including the date and what the child has said in the child's words in a 'Safeguarding Record of Concern' booklet and hand to the DSL or a deputy.
- Record any visible signs, injuries or bruises on a Body Map. Guidelines on using a Body Map are included on the form. At no time should photographic evidence of any injuries or marks to a child's person be taken as this type of behaviour could lead to the staff member being taken into managing allegation procedures.
- The 'Safeguarding Record of Concern' booklet should be filled in as soon as is practicable and certainly within 24 hours.
- 'Safeguarding Record of Concern' booklets can be found in the main school staffroom, Early Years staffroom and office area of the Music Room.
- If the Designated Safeguarding Lead & Deputies are not available, contact Jonathan Teesdale (Safeguarding Director 07801 585301), a member of the SLT and/or take advice from children's social care. Reporting suspicion of child abuse should not be delayed. The DSL should be informed as soon as possible.

2.4 Action by the DSL (or deputy DSL in their absence)

Following any information raising concern, the DSL will consider:

- any urgent medical needs of the child;
- whether the child is subject to a child protection plan;
- discussing the matter with other agencies involved with the family;
- consulting with appropriate persons;
- the child's wishes.

Then decide:

- to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk;
- whether to make a child protection referral to Children's Social Care Duty and Advice Team because a child is suffering or is likely to suffer significant harm. **If a child is at risk, this needs to be undertaken immediately**;
- if a crime has been committed, to inform Police;

OR

- not to make a referral at this stage;
- if further monitoring is necessary;
- to implement pastoral support in school;
- if it would be appropriate to undertake an assessment (e.g. Early Help Assessment – EHA – see Section 5.20) and/or make a referral to Children's Social Care - Customer Service Centre.

2.5 Action following a child protection referral

The DSL or other appropriate member of staff will:

- make regular contact with the social worker involved to stay informed;
- wherever possible, contribute to the strategy discussion;
- provide a report for, attend and contribute to any subsequent child protection conference;

- if the child or children are made the subject of a child protection plan, contribute to the child protection plan and attend core group meetings and review conferences;
- where possible, share all reports with parents prior to meetings;
- where a child subject to a child protection plan moves from the school, is absent or goes missing, immediately inform Children's Social Care Customer Service Centre.

When in disagreement with a decision and concerns still remain with the child firstly:

1. Talk in the first instance to the DSL.
2. Check the referral included all the relevant information and clearly documented the concerns about the child.
3. Finally follow the LSCP Professional Resolution and Escalation Protocol.

2.6 Recording and monitoring

Any concerns about a child will be recorded in writing as soon as is practicable and certainly within 24 hours using a 'Safeguarding Record of Concern' booklet. These can be found in the main school staffroom, Early Years staffroom and office area of the Music Room. The record will provide a factual, evidence-based account and clearly distinguish between observation, fact, opinion and hypothesis. All records will state who is providing the information, the date and the time. Information will be recorded in the child's words where possible and a note made of the location and description of any injuries seen using the Body Map. Photographs of injuries must not be taken. The booklet should be signed and given by hand to the DSL or a deputy. See section 2.3.

Consistency is paramount in ensuring that nothing gets missed so the DSL ensures that this method for members of staff or volunteers to pass on concerns or information is always adhered to. All records of concern are followed up and clearly show what action is being taken as a result of the concern and the outcomes of this action.

Timely, accurate recording of every episode/incident/concern/activity/actions will be made including telephone calls to other professionals.

All documents relating to safeguarding and child protection concerns will be kept in a separate, confidential file, securely stored away from the main pupil file. The locked filing cabinet is in the Headteacher/DSL's office. Authorisation to access records is controlled by the DSL. Electronic sensitive information should be stored on school servers and only loaded onto laptops for short-term access. If it is necessary to store child protection information on portable media, these items should also be kept in locked storage and files should be password protected. See section 2.2 for details about record transfer & retention.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. This includes allowing practitioners to share information without consent. Refer to Information sharing advice for safeguarding practitioners

Section 3 Pupil Information

3.1 In order to keep children safe and provide appropriate care for them the school requires accurate and up-to-date information regarding:

- names, contact details and relationship to the child of any persons with whom the child normally lives;
- names and contact details of all persons with parental responsibility (if different from above);
- emergency contact details (if different from above), ensuring that if the person(s) with parental responsibility is unable to collect their child, the emergency contact could collect the child and keep them safe until either the person(s) with parental responsibility is available or a more suitable arrangement is made. #
- the school asks all parents and carers to provide at least two contact numbers, providing the school with additional options to make contact with a responsible adult when a child absent from education is identified as a welfare and/or safeguarding concern;
- details of any persons authorised to collect the child from school (if different from above);
- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.);
- if the child is or has been subject to a Child Protection Plan;
- if the child is or has been subject to an Early Help Assessment (EHA) or Child In Need (CIN) processes;
- If the child is in care (Looked After Child (LAC)) or has previously been in care (previously looked after);
- name and contact details of G.P;
- any other factors which may impact on the safety and welfare of the child.

The school will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting data protection and safeguarding requirements. Paper files are stored in locked filing cabinets. The Pupil Info database is password protected.

3.2 Transfer of files

When a child leaves the school, the child protection file is transferred to the new school as soon as possible by recorded delivery to be signed for. A 'File Transfer Record and Receipt Form' is completed by the Designated Safeguarding Lead (DSL) and included. A copy of the transfer form is kept. The child protection file is clearly marked 'Child Protection, Confidential, FAO Designated Safeguarding Lead'.

The receiving school should sign the bottom half of the transfer form to say that they have received the files and return the form to Copthill School for tracking and auditing purposes.
The 'File Transfer Record and Receipt Form' is kept by Copthill School until the child reaches their 25th birthday and contains:

- name and date of birth of child;
- name & address of receiving school;
- date file(s) transferred with name and role of person who received it;
    - date sending school received confirmation of receipt of files from receiving school;
    - summary of case at the time of transfer e.g. Child Protection Plan: Neglect.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

The pupil record should not be weeded before transfer to the next school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

Electronic documents that relate to the pupil file also need to be transferred, or, if duplicated in a master paper file, destroyed.

Sending schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school to which the pupil transfers.

The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This school retains a copy of the child's chronology and any documents that the school created, e.g. risk assessment, in an archive until the child reaches the age of 25 years; the receipt of the transferred file is kept alongside this archive. Any archived files are stored securely in the same way as an active file. If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. (DOB + 25 years).

Sources of further support:

- Data protection: a toolkit for schools August 2018
- Data protection advice service - EduLincs
- Perspective Lite - LA Documents > Safeguarding > Safeguarding Documents > Data Protection and Information Sharing

It is important to note that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

Section 4 Roles and Responsibilities

4.1 The role of our Directors is so important in robust safeguarding practice. Copthill School's Directors will ensure that:

- there is a named Safeguarding Director;
- the school has an effective Child Protection and Safeguarding Policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is available publically via the school website and other means; for example, via the School Office. The policy will be reviewed and updated on an annual basis;
- the school has a staff code of conduct and that this is provided to all staff and volunteers on induction. The policy includes acceptable use of technology, staff/pupil relationships and communications including the use of social media;
- the school operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children. Any panel involved in the recruitment of staff should have at least one member who has undertaken safer recruitment training in the last 6 years and accessed updates on changes to safer recruitment legislation and procedures more regularly;
- the school has procedures for dealing with allegations against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures;
- online safety policy and procedures are in place and training and support is provided for staff and pupils to ensure that there is a good understanding of child protection issues related to electronic media. Parental engagement is also considered as part of this;
- the school has appropriate electronic filtering and monitoring systems in place which are reviewed at least annually and/or when a safeguarding risk is identified, there is a change in working practice and/or new technology is introduced to ensure effectiveness. This is to ensure that children are safeguarded from potentially harmful and inappropriate online material whilst recognising that 'over-blocking' should not lead to unreasonable restrictions as to what children can be taught;
- a senior member of the school's leadership team is appointed to the role of Designated Safeguarding Lead (DSL) and will take lead responsibility for safeguarding and child protection. The Directors will work with the DSL to ensure that sufficient time and resources are available to carry out their role;
- the school has one or more deputy DSLs who are trained to the same standard as the lead DSL;
- procedures are in place to minimise the risk of child on child abuse;
- children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This may include covering relevant issues through Relationships Education and through Personal, Social, Health and Economic (PSHE) education. Relationships Education and Health Education became mandatory from September 2020;
- staff undertake appropriate safeguarding training which is updated at least annually;
- members of the Advisory Panel take part in mandatory safeguarding training to ensure that they can assure themselves that the safeguarding policies and procedures in place at Copthill School are effective. This training is regularly updated;
- they remedy, without delay, any deficiencies or weaknesses regarding child protection arrangements;
- a Director is nominated to be responsible for liaising with the Local Authority LADO Team and/or partner agencies in the event of allegations of abuse being made against the headteacher;
- where services or activities are provided on the school premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the school on these matters where appropriate. Copthill School ensures that relevant checks have been carried out through obtaining written confirmation from the employer of the third party;
- they review their policies and procedures annually;

- the school appoints an appropriately trained designated teacher with responsibility for 'promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales' in addition to children in care (Looked After Children (LAC)). The Designated Teacher for Children in Care and Children Previously in Care (Looked after children and previously looked after children) is Anne Teesdale;
- they report to the DFE and to DBS, within one month of leaving Copthill School, any person (whether employed, contracted, a volunteer or student) no longer used because he or she is considered unsuitable to work with children. Professional misconduct will be reported to TRA.

4.2 Copthill School's Headteacher, who is the Designated Safeguarding Lead (DSL), will ensure that:

- the policies and procedures adopted by the Directors are fully implemented and followed by all staff;
- sufficient resources and time are allocated to enable the DSLs and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings and contributing to the assessments of children;
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies and use of the LSCP Professional Resolution & Escalation Protocol. The NSPCC's Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 (the line is available from 8am-8pm Mon-Fri and 9am-6pm at the weekends) and email: help@nspcc.org.uk – see section 6.4;
- she provides a report and attends Initial Child Protection Case Conferences, Reviews and Looked After Children Reviews out of school term time when needed;
- allegations regarding staff or any other adults in the school are referred to the Local Authority Designated Officer (LADO) via Local Authority Designated Officer (LADO) or LSCP_LADO@lincolnshire.gov.uk or on 01522 554674 within one working day including any involvement of the Police. The Emergency Duty Team should be contacted outside normal working hours 01522 782333.
- individuals are referred to the Disclosure and Barring Service in cases where a person is dismissed or left due to risk/harm to a child. This is a legal duty placed upon the school.

The Headteacher/DSL has full responsibility and authorisation for reporting safeguarding concerns regarding the proprietors to the LADO without the need to consult with other staff or directors.

4.3 As stated in *Keeping Children Safe in Education 2024* *(Annex C)*, Copthill School's Designated Safeguarding Lead (DSL), and/or deputies (DDSL) in the DSL's absence, are responsible for safeguarding and child protection at Copthill School.

The DSL takes lead responsibility for safeguarding and child protection, including online safety. At least annually and/or when a safeguarding risk is identified, there is a change in working practice and/or new technology is introduced, the DSL, along with the Directors and Online Safety Coordinator, reviews our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. The DSL also ensures that staff know to report any difficulties with the system to the DSL or deputies and that such reports are effectively managed.

A DSL or DDSL will always be available during school hours for staff in the school to discuss any safeguarding concerns. This availability may include contact via telephone, email or other electronic means. Arrangements will made for appropriate cover for any out of hours/out of term activities.

Their role includes ensuring that staff know who their vulnerable or potentially vulnerable children are, understand their additional needs, academic progress and attainment and maintain a culture of high aspirations for this cohort by supporting teaching staff to identify the challenges that children in this group might face and the additional support and adjustments, both pastoral and academic that could be made to best support them.

The DSLs and deputies will ensure that they:

Manage referrals from school staff or others from outside the school

- refer cases of suspected abuse to the relevant local authority children's social care Customer Service Centre;
- support staff who make referrals to Customer Service Centre;
- seek advice from Prevent Team regarding radicalisation concerns and refer cases to the Channel programme when necessary;
- support staff who make referrals to the Channel programme when advised by Prevent team;
- refer cases to the Police where a crime may have been committed.

Work with others

- liaise with the Safeguarding Director to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the 'case manager' (as per part four of *Keeping Children Safe in Education 2024*) and the designated officer (LADO) for child protection concerns which concern a staff member or volunteer;
- liaise with Online Safety Coordinator in matters regarding online safety;
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for staff;
- ensure that child protection information is transferred to a pupil's new school;
- work with external agencies and professionals on matters of safety and safeguarding;
- be aware of pupils who have a social worker;
- take into account the learning from the following review - Help, protection, education: concluding the Children in Need review (June 2019) (page 38)
- 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 leadership staff. Their role could include ensuring that the school 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;
- act as a point of contact with safeguarding partners;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- be aware of the requirement for children investigated by the police to have an Appropriate Adult.

Support the child and partnership with parents

Copthill School recognises that the child's welfare is paramount. Good child protection and safeguarding practice and outcomes rely on a positive, open and honest working partnership with parents

Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

We will provide a secure, caring, supportive and protective relationship for the child.

Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.

We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The DSL will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the child.

Undertake training

The DSL and deputies will undergo training to provide them with the knowledge and skills required to carry out the role. Lincolnshire has a combined LSCP and education six-year Safeguarding Training Plan which is used by the DSL and deputies to identify training needs - Lincolnshire Safeguarding Children's Partnership (LSCP). DSL and deputy DSL training will be updated at least every two years. They will also undertake Prevent awareness training.

In addition to the formal training, their knowledge and skills will be refreshed at regular intervals as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

This will be done by, for example, attending the termly LCC DSL Safeguarding Briefings and by attending appropriate Lincolnshire Safeguarding Children Partnership inter-agency training and other relevant training and/or conference opportunities (see also section 5.10) so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff, especially new and part time staff has access to and understands the school's safeguarding and child protection policy and procedures;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise awareness

- ensure the school or college's child protection and safeguarding policies are known, understood and used appropriately;
- ensure the school or college's child protection and safeguarding policy is reviewed annually, the procedures and implementation are updated and reviewed regularly and work with the directors regarding this;

- ensure the child protection and safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this;
- link with the Lincolnshire Safeguarding Children's Partnership (LSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Availability

During term time time and school hours, there should always be a DSL/deputy available who has the necessary seniority and skills, undertakes appropriate safeguarding training, and is given the time to carry out this important role.

The DSL can also be contacted via the mobile number at the front of this policy during any out of hours/out of term activities.

The deputy DSLs will at all times support the DSL and act in her absence. If neither the DSL nor deputies are available, staff should speak to the Safeguarding Director (the Principal. Advice can also be sought from local children's social care – see Appendix 1 – or from the NSPCC – 0808 800 5000 or help@nspcc.org.uk

4.4 All staff and volunteers will:

- read and sign to say that they understand part 1 (which includes Annex B) of *Keeping Children Safe in Education 2024;*
- read and sign to say that they understand and will fully comply with the school's policies and procedures, including:
    - Child Protection and Safeguarding Policy, including our response to children who are absent from education;
    - Staff Code of Conduct;
    - Promoting Positive Behaviour Policy.
- identify concerns as early as possible and provide help to prevent concerns from escalating;
- identify children who may be in need of extra help or who are suffering or are likely to suffer significant harm;
- attend annual whole school safeguarding training and other appropriate training identified;
- undertake training to understand the risks of poor filtering and monitoring and know how to share their concerns;
- take part in annual cybersecurity training;
- provide a safe environment in which children can learn;
- be aware that they may be asked to support a social worker to make decisions about individual children;
- inform the DSL of any concerns about a child immediately;
- remember that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful;
- inform the Headteacher of any concerns regarding an adult within school at the earliest opportunity;
- inform the Safeguarding Director of any concerns regarding the Headteacher at the earliest opportunity;
- act on the concern and make the referral themselves if they feel the concern is not being taken seriously – **anybody can make a referral**.

Anybody can make a referral. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

4.5 Advisory Panel Members will:

- take part in mandatory safeguarding training to ensure that they can assure themselves that the safeguarding policies and procedures in place at Copthill School are effective. This training is regularly updated;

Section 5 Providing a Safe and Supportive Environment

5.1 Safer recruitment and selection – *see Part 3 of Keeping Children Safe in Education 2024* and ***Safer Recruitment and Selection Policy*** (Personnel Handbook 1.9)

The school pays full regard to DfE guidance *Keeping Children Safe in Education 2024* and with reference to the 'Position of Trust' offence (Sexual Offences Act 2003).

We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult including, for example, volunteers and staff employed by contractors.

We do this by:

- scrutinising applicants, including an online search, verifying identity and academic and vocational qualifications, obtaining professional references, checking previous employment history (including any additional checks thought appropriate for staff who have lived or worked outside the UK) and ensuring that a candidate has the health and physical capacity for the job. We also undertake interviews and all relevant safer recruitment checks, including appropriate Disclosure and Barring Service (DBS) and reference checks. We check the Children's List and the existence of any teacher prohibition orders (checked via the 'Teacher Services' system) and carry out the right to work in England checks in accordance with DBS and Department for Education procedures. This includes prohibition from management – Section 128 direction. At least one member of every recruitment panel has completed Safer Recruitment training within the last 6 years and accessed updates on changes to safer recruitment legislation and procedures more regularly.
- ensuring that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018. The childcare disqualification arrangements apply to staff working with young children in childcare settings, including primary schools, and predominantly apply to individuals working with children aged 5 and under, including reception classes, but also apply to those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care.
- ensuring that staff, volunteers and other adults on site are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents, adhering to a published Code of Conduct and other professional standards at all times, including after school activities. Staff are aware of what we expect regarding social media/online conduct. See Policy 6.13-i Staff Code of Conduct.
- ensuring any disciplinary proceedings against staff related to child protection matters are concluded in full in accordance with Government guidance Keeping Children Safe in Education 2024*)* and LSCP, LADO and HR Policy, procedures and guidance. The school will report staff promptly to the **DBS** and **TRA** where required by the appropriate guidance.
- establishing adequate risk assessments, including for extended school, volunteer and holiday activities.
- supporting staff confidence to report misconduct.

In line with statutory requirements, underpinned by regulations, Copthill School maintains a Single Central Record (SCR). This document includes the following people:

- all staff who work at the school;
- all members of the proprietor body.

The information that must be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained**, and** the date on which each check was completed/certificate obtained apply:

- an identity check;
- a barred list check;
- an enhanced Disclosure and Barring Service (DBS) check;
- a prohibition from teaching check;
- a section 128 check (for management positions as set out in paragraph 99 for independent schools, including free schools and academies);
- further checks on people who have lived or worked outside the UK: this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

For supply staff, the school will include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received. The identity of the supply staff will be checked on arrival.

A risk assessment is carried out on all volunteers. Where checks are carried out on volunteers, the school will record this on the single central record. Under no circumstances will a volunteer for whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with a child.

Visiting speakers are checked as suitable (whether invited by staff or pupils) and supervised.

5.2 Home-stays (exchange visits)

If children from overseas are staying with UK parents as part of an exchange organised by the school, those parents will be deemed to be in 'Regulated Activity' for the duration of the stay and as such will require to submit an enhanced DBS check including barring check. As a volunteer, all checks will be processed free of charge by the DBS. Where additional people in the host family are aged over 16 (i.e. elder siblings) the school will consider on a case by case risk assessment basis whether such checks are necessary.

5.3 Safer working practice

Our school will comply with the current *Guidance for safer working practices for those working with children and young people in education settings 2022*

Safe working practice ensures that pupils are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- work in an open and transparent way;
- work with other colleagues where possible in situations open to question;
- discuss and/or take advice from school management over any incident which may give rise to concern;
- record any incidents or decisions made;
- apply the same professional standards regardless of gender, sexuality or disability;
- comply and are aware of the confidentiality policy;
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

If Copthill School staff have concerns about another member of staff, they will report these to the Headteacher/DSL. In her absence, the concern should be reported to the Safeguarding Director. The LADO will then be contacted - Local Authority Designated Officer (LADO) or LSCP_LADO@lincolnshire.gov.uk.

Where staff members have concerns about the Headteacher, these will be reported to the Safeguarding Director, who will then contact the LADO.

The Headteacher/DSL has full responsibility and authorisation for reporting safeguarding concerns regarding the proprietors to the LADO without the need to consult with other staff or directors.

If Copthill School staff have concerns about safeguarding practices, they should know how to address them. All staff and volunteers should feel able to challenge and raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime or to raise concerns about other agencies by using the LSCP Professional Resolution and Escalation Protocol Any such concerns will be taken seriously by the senior leadership team, Headteacher and Directors.

5.4 Whistleblowing Policy

Our School has a Whistleblowing Policy - Policy 6.15i – to which staff should refer where there are concerns about the way safeguarding is carried out in the school. Every member of staff, including temporary staff, contractors and volunteers, must be informed of the School's whistleblowing arrangements. Every staff member should know:

- what protection is available to them if they decide to report another member of staff;
- what areas of malpractice or wrongdoing are covered in the School's whistleblowing procedure;
- the different routes available to them for reporting a concern, including who they can approach both in and outside the School.

We will ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and/or an incident involving a member of staff and that such concerns are addressed sensitively and effectively in accordance with the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a legal obligation has been breached;
- there has been a miscarriage of justice;
- the health or safety of any individual has been endangered;
- the environment has been damaged;
- information about any of the above has been concealed.

If any member of staff has concerns regarding a child and they feel that the School has not responded appropriately, they must contact one of the following:

- Safeguarding Director – Jonathan Teesdale Tel: 07801 585301
- Advisory Panel Member for Safeguarding – Margaret Miles Tel: 07729 053717
- The Local Authority – 0800 0853716 or whistleblowing@lincolnshire.gov.uk
- Lincolnshire Police – 101

- Ofsted: Tel. 08456 404040
- The NSPCC Whistleblowing Advice Line for Professionals - 0800 028 0285 – 8.00am to 8:00pm, Mon-Fri and 9am-6pm at the weekends, and/or help@nspcc.org.uk.
    - Staff should use this line if:
        - the school doesn't have clear safeguarding procedures to follow;
        - they believe their concerns won't be dealt with properly or may be covered up;
        - they have raised a concern but it hasn't been acted upon;
        - they are worried about being treated unfairly.

- Staff can call about an incident that happened in the past, is happening now or they believe may happen in the future.

5.5 Filtering and Monitoring

Filtering refers to the technology preventing access to harmful or inappropriate content.

Monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. This includes:

- physical monitoring;
- monitoring user logs;
- monitoring individual devices.

For example, the Online Safety Coordinator receives a notification from noreply@securly.com should an individual attempt to access a disturbing website or disturbing keywords be entered into a search engine. Opendium provides a weekly search words word cloud.

We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.

At least annually and/or when a safeguarding risk is identified, there is a change in working practice and/or new technology is introduced, the DSL, along with the Directors and Online Safety Coordinator, reviews our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. The DSL also ensures that staff know to report any difficulties with the system to the DSL or deputies and that such reports are effectively managed.

All staff undertake training to understand the risks of poor filtering and monitoring and know how to share their concerns.

All staff take part in annual cybersecurity training.

Filtering and monitoring is not a standalone area of safeguarding but impacts on a number of areas, as reflected in this policy.

All staff should report to the DSL if they:

- access unacceptable content themselves – for example, when lesson planning;
- see or suspect unacceptable content accessed by pupils;
- are delivering teaching and learning activities that could cause a spike in logs;
- perceive unreasonable restrictions;
- recognise abbreviations or misspellings that allow access to unacceptable content.

5.6 Mobile phones

These regulations are to ensure a professional manner, full supervision of pupils and to protect staff from safeguarding allegations.

Whilst at work on school premises, mobile phones should:

- never be used when pupils are present or in areas of the school used by pupils (classrooms, playgrounds, sports fields etc.) unless in an emergency;
- only be used when deemed absolutely necessary;
- be kept in silent or discreet mode during the day;
- be kept out of sight – in the Early Years Department mobile phones are kept in the Early Years Office.

When risk assessing activities to be carried out with children or in particular circumstance (for example, when working outside the classroom with a child with specific health needs), it might be

deemed necessary for staff to carry a mobile phone. In such cases, a permit should be requested from and signed with the DSL.

Staff should never give out their home or mobile number to pupils and never engage in texts to/from pupils.

Staff leaving the premises for a school visit or fixture will be expected to have access to their mobile phone for emergencies and contact with school. Their number should have been left at the office on the visit paperwork.

The school must be kept informed of the current mobile number of all staff.

SLT members may be required to use their mobile phone to conduct their day-to day school business/administration but this should be done away from pupil areas.

Early Years Department – personal mobile devices, cameras and other electronic devices with imaging and sharing capabilities (such as smartwatches and smart glasses) must **NOT BE USED UNDER ANY CIRCUMSTANCES** to take pictures or video children in the Early Years Department. Staff must use the school devices for all photography and videoing.

Staff who wear smartwatches must ensure that the associated mobile device is out of connection range and/or the smartwatch is not connected to the school's Wi-Fi (in the Early Years Department mobile phones, for example, are kept in the Early Years Office). Smartwatches that do not require connection to an associated mobile device are not permitted.

Lower and Upper School Staff - for data protection and safeguarding reasons, personal mobile phones must not be used for taking images **UNLESS** staff have signed a permit with the DSL. This might be for a specific event (ie off-site event) or granting ongoing permission.

Once a permit has been signed, a staff member must abide by the following procedure at all times:

- The photo is transferred to the specific photo area of the school server as soon as practicable.
- The photo is deleted from the mobile phone as soon as is practicable – certainly within 48hours.
- Permission is granted to the DSL to check after an event or randomly that content has been deleted.

Any staff found in breach of the mobile phone policy may face disciplinary action.

5.7 Remote Education

Keeping children and teachers safe during remote education is essential. Teachers delivering remote education online should be aware that the same principles set out in the school's Code of Conduct apply.

In conversations with parents, carers and children the importance of a safe online environment will be emphasised, which amongst other things, means keeping any passwords and credentials safe. Support and advice on how to do this will be offered.

Parents and carers will be made aware of what their children are being asked to do, including:

- sites they will be asked to use
- school staff their child will interact with

Children may be learning both online and in the classroom. All staff should continue to act immediately, in accordance with the procedures outlined in this policy, if they have any concerns about a child or young person's welfare, whether the child or young person is physically in school or learning from home.

Children should be encouraged to speak up if they come across something worrying online.

We will refer to guidance found at https://www.gov.uk/guidance/safeguarding-and-remote-education and https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools

See also Appendix 5 – Remote Education Policy

5.8 Risk assessments

Risk assessments are taken seriously and used to good effect to promote safety. Risk assessments are available for all aspects of the school's work.

Where relevant, risk assessments are carried out for individual pupils, and supported by action plans identifying how potential risks would be managed.

Individual risk assessments are also used when deciding a response to a child demonstrating potentially harmful behaviour, such as sexually harmful behaviour or when identifying whether a child who may be particularly vulnerable, such as a child at risk of Child Sexual Exploitation. These risk assessments will consider filtering and monitoring of access to the internet.

5.9 Safeguarding Information for pupils

At Copthill School, pupils are taught about safeguarding, including online, through various teaching and learning opportunities as part of our broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. For example, this might be Relationships Education, Personal, Social, Health and Economic (PSHE) Education and assemblies.

The school is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. We inform pupils of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm. PSHEE and online safety awareness materials are used to help pupils learn how to keep safe, for example, NSPCC Speak Out Stay Safe.

Our school's arrangements for consulting with, listening to and responding to pupils are made through Form Teachers, Tutors, School Council and a friendly environment which encourages pupils to talk to staff. All pupils in our school are regularly reminded that they can approach any member of staff.

5.10 Partnership with parents and carers

The school shares a purpose with parents to educate and keep children safe from harm.

Copthill School takes steps to ensure all parents and carers understand the Child Protection and Safeguarding Policy. The policy is available through the School's website. A written copy will be provided on request to the school office. Parents can raise a concern about their child's safety or about general safeguarding concerns in the school by informing the School immediately where there is risk of harm to a child or by raising the concern through the School's complaints procedure – Policy 1.7 Complaints Policy – Parental.

When the School has concerns for the safety of a child, parents are made aware of these concerns and their consent is sought in line with local safeguarding procedures unless doing so would increase the risk of harm to the child.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

Copthill School is committed to ensuring the welfare and safety of all children in school. The school will, in most circumstances, endeavour to discuss all concerns about children with their parents. However, there may be exceptional circumstances when discussion with parents will place a child at risk of harm; in such circumstances, the school will discuss concerns with the Children's Services Customer Service Centre and/or the Police without parental knowledge. The school will, of course, always aim to maintain a positive relationship with all parents.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

5.11 Partnerships with others

Our school recognises that it is essential to establish positive and effective working relationships with other agencies. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children.

5.12 School training and staff induction

Copthill School's DSLs, with responsibility for child protection, undertake appropriate child safeguarding training and inter–agency working training.

The DSL and deputies will undergo training, including inter-agency working and Prevent, to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

In addition to their formal training, their knowledge and skills will be updated regularly, and at least annually, through, for example:

- subscriptions to Andrew Hall's Safeguarding.Pro and weekly newsletters;
- NSPCC's CASPAR weekly update;
- NSPCC Safeguarding in Education update;
- Alan Mackenzie's online safety weekly update;
- Thinkuknow news updates;
- Lincolnshire's weekly Safeguarding Bulletin uploaded on Perspective Lite;
- Lincolnshire's termly DSL Safeguarding Briefings;

This will ensure they keep up with any developments relevant to their role.

All other school staff, including non-teaching staff, will receive appropriate safeguarding and child protection training, to include Prevent, online safety, filtering and monitoring and cyber-security, which is regularly updated.

In addition, all staff members will receive safeguarding and child protection updates as required, but at least annually, for example, via:

- weekly updates at the staff briefing;
- e-mail;
- Staffnet;
- staff meetings.

This will provide them with relevant skills and knowledge to safeguard children effectively.

All staff receive a mandatory safeguarding update as part of their induction:

- 2.6 - Promoting Positive Behaviour Policy, including:
    - measures to prevent bullying, including online bullying, prejudice-based and discriminatory bullying
- 5.4 - Online Safety Policy
- 6.3-i Induction of New Staff in Safeguarding

- 6.4-i Restraint Policy
- 6.5-i Child Protection and Safeguarding Policy, including:
    - the identity and role of the Designated Safeguarding Lead (DSL) and deputies
    - safeguarding response to children who are absent from education
    - policy and procedures for dealing with child on child abuse
- 6.13-i Staff Code of Conduct, including:
    - Professional Relationships
    - Mobile Phones
    - Participation in online social networking websites and blogs
    - Emails
    - Working with Pupils
    - Safeguarding Children
    - Low-level concerns
- 6.14-i *Keeping children safe in education: part 1 (which includes Annex B) 2024*
- 6.15-i Whistleblowing Policy
- 8.18-i Mental Health Policy

Three members of staff involved in the recruitment process have undergone Safer Recruitment Training. This will be updated at least every 6 years and updates on changes to safer recruitment legislation and procedures will be accessed more regularly.

5.13 Support, advice and guidance for staff

Staff will be supported by the DSL, deputy DSLs, Safeguarding Director and professional associations.

The DSLs will be supported by the Safeguarding Director and the Advisory Panel member, Margaret Miles.

Copthill School seeks advice about safeguarding concerns from Lincolnshire Customer Services on 01522 782111 and for non-urgent early help queries from our Early Help Consultant, Ann Wright - ann.wright@lincolnshire.gov.uk.

The LCC Safeguarding and Education Welfare Supervisor for Education Settings, Ruth Fox, is available on 01522 554695, or via safeguardinginschool@lincolnshire.gov.uk, for non-urgent safeguarding advice about training, policy, audit etc.

Section 6 Allegations regarding Person(s) Working in or on behalf of School (including Volunteers)

Also see Policy 6.16 – Allegation Against Staff

At Copthill School, we recognise the possibility that adults working in the school may harm children, including directors, volunteers, supply teachers and agency staff.

Any concerns about the conduct of other adults in the school (for example, a member of staff, supply teacher, volunteer or contractor) should be taken to the Headteacher without delay. The Headteacher will contact the Local Authority Designated Officer (LADO). Where there might be a conflict of interest in reporting the matter to the Headteacher, contact the LADO directly - Local Authority Designated Officer (LADO) or LSCP_LADO@lincolnshire.gov.uk

Any concerns about the Headteacher should go to the Safeguarding Director, without informing the Head. The Safeguarding Director will contact the LADO without delay.

Where there are concerns about the proprietor(s), the Headteacher/DSL will contact the LADO without delay.

Concerns may come from various sources, for example:

- a suspicion;
- complaint;
- disclosure made by a child, parent or other adult within or outside Copthill School;
- as a result of vetting checks undertaken.

As per Part 4 of Keeping Children Safe in Education 2024, Copthill School recognises two levels of concerns:

- **Allegations that meet the harms threshold;**
- **Concerns that do not not meet the harms threshold, referred to as 'low-level concerns'.**

The Headteacher has to decide whether the concern is an allegation or low-level concern. Our Staff Code of Conduct outlines our expectations of staff and how they should behave.

The term 'low-level concern' does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold for a referral to the LADO.

Low-level concerns should be addressed separately (see 6.2). It is important to share low-level concerns to create and embed a culture of openness, trust and transparency in which Copthill School's values and expected behaviour, as set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

6.1 Allegations that meet the harms threshold

An allegation is made if it is reported that any adult, either employed or as a volunteer, working in or on behalf of the school (including contractors), has:

- behaved in a way that has harmed a child or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This also includes behaviour outside the school to take account of situations where a person's behaviour outside school may suggest 'transferable risk'. For example, where a

member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children.

We will apply the same principles as in the rest of this document and child protection procedures must be followed. Detailed records will be made to include decisions, actions taken, and reasons for these. All records will be retained securely.

Whilst we acknowledge such allegations (as all others) may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

Initial action to be taken

- The person who has received an allegation or witnessed an event will immediately inform the Headteacher and make a record.
- In the event that an allegation is made against the Headteacher, the matter will be reported to the Safeguarding Director.
- In the event that an allegation is made against the proprietor(s), the Headteacher/DSL has full responsibility and authorisation to report to the LADO without the need to consult with other staff or directors.
- The priority in any allegation is the safety of the child. The Headteacher/Safeguarding Director will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs. The DSL (Headteacher) will follow normal safeguarding procedures if there is risk of harm to a child.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children. We will inform the person subject to the allegation when it is right to do so based on advice from LADO and, if appropriate, social care and the Police.
- The Headteacher/Safeguarding Director will undertake basic enquiries to obtain facts, being careful not to to jeopardise any potential police investigation. All investigations will be carried out by:
    - applying common sense and judgement;
    - dealing with the allegation quickly, fairly and consistently;
    - providing protection for the child and support for the person subject to the allegation.
- The Headteacher, or Safeguarding Director, if the allegation is about the Headteacher, will report to the LADO **without delay**, in order to determine if it is appropriate for the allegation to be dealt with by school or whether there needs to be a multi-agency response to the matter. Contact information in Appendix 1.
- Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by Police or Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:
    - the vulnerability of children away from home;
    - the higher standards of conduct demanded by law and regulation of those caring for other people's children;
    - the position of trust enjoyed by such people.
- The role of the LADO is not to investigate the allegation but to ensure that an appropriate investigation is carried out, whether by the Police, children's social care, the school or a combination of these.
- The needs of the child or children will remain at the centre of all action taken. With this in mind, any referral to the LADO should also be accompanied by consultation with Lincolnshire Customer Service Centre when appropriate. This is to establish from the outset whether the concerns identified meet the threshold for a Section 47 child protection investigation and/or the police in respect of any criminal investigation.
- Consideration will be given throughout to the support and information needs of pupils, parents, staff and the employee who is the subject of the allegation.

- The Headteacher will inform the directors of any allegation against a member of school staff.

Following the initial investigation and discussions with LADO, there may be an outcome of:

  - no further action – a record of the decision and rationale will be made as well as a decision regarding information to be shared with the individual;
  - further enquiries – following discussion with LADO, these are carried out by the Headteacher/Safeguarding Director and/or our HR Advisor, depending on the nature of the investigation.

If consideration needs to be given to the individual's employment and immediate management of risk, advice will be sought from the HR advisor employed by Copthill School.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. Decisions about suspension are made on a case by case basis and will depend on the nature and seriousness of the allegation. Suspension is not an automatic response when an allegation is reported. Suspension will be implemented if there is cause to suspect a child is at risk of any harm or if the case is so serious that it is most likely to result in dismissal. The Headteacher and Safeguarding Director will seek guidance from LADO as well as social care and Police to decide whether suspension is the most appropriate action.

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with in a timely manner, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

This process should be followed for members of staff/volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place – i.e. the allegation may relate to the individual's personal life or be historic.

<u>Outcomes</u>

The possible outcomes from an allegation are:

Substantiated: there is sufficient evidence to prove the allegation;

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Following the decision, the Headteacher/Safeguarding Director, with support from LADO, will determine the next actions. If an allegation was found to be malicious, the school must consider whether the person/child who made the allegation is in need of help themselves and whether a referral to customer services is required.

Details of the allegations will be kept on the file of the person accused, except those resulting in a malicious outcome where the choice to retain is that of the individual.

In fulfilment of the regulatory requirements, the Directors will report to the DFE and to DBS, within one month of leaving Copthill School, any person (whether employed, contracted, a volunteer or student) no longer used because he or she is considered unsuitable to work with children. Professional misconduct will be reported to TRA.

Early Years Department

The Directors will also inform Ofsted as soon as is reasonably possible, but at the latest within 14 days, of any allegations of serious harm or abuse by any person working or looking after children on the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

OFSTED - **Picadilly Gate, Store Street, Manchester M1 2WD Tel: 0300 123 1231**

Supply Teachers

If the allegation is in relation to a supply teacher, Copthill School will seek guidance from LADO and the agency as to the appropriate actions in relation to employment or deployment of the individual within the school and across other schools. The agency should then fully cooperate with the school in any investigations that need to take place. The allegations management meeting arranged by LADO will take into consideration any previous concerns in relation to the individual.

Where there is an allegation about a supply teacher, whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The school or college will usually take the lead in any investigation because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Non-recent allegations

If an adult wishes to raise an allegation to the school that they were abused as a child, the adult will be strongly advised to contact the police. Any non-recent allegation made by a child must be reported to the LADO who will follow the local authority procedures for dealing with historic reporting of incidents.

6.2 Low-Level Concerns (concerns that do not not meet the harms threshold).

Concerns may be graded low-level if:

- the concern does not meet the criteria for an allegation;
- any adult, either employed or as a volunteer, working in or on behalf of the school (including contractors) has acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.

Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating children.

Any low-level concerns about the conduct of other adults in the school (for example, a member of staff, supply teacher, volunteer or contractor) should be taken to the Headteacher. Where there might be a conflict of interest in reporting the matter to the Headteacher, contact the LADO.

Any low-level concerns about the Headteacher should go to the Safeguarding Director.

Where there are concerns about the proprietor(s), the Headteacher/DSL will contact the LADO.

If the concern has been raised via a third party, the Headteacher/Safeguarding Director will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved;
- any witnesses.

Reports about supply staff and contractors will be directed to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be 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.

Low-level concerns should be recorded in writing, including:

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

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Copthill School will retain this information until the individual leaves our employment.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

If a concerning pattern of behaviour is identified, the school will decide upon a course of action. This might be internal disciplinary procedures or, if the behaviour meets the criteria for an allegation, then the matter should be referred to the LADO.

The review of records might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This will mean that policies or processes will be reviewed and revised and extra training delivered to minimise the risk of it happening again.

The rationale for all decisions and actions taken will be recorded.

Section 7 Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Staff are aware that safeguarding also relates to broader aspects of care and education including children's health and safety and well-being, including their mental health.

- All staff are 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. Staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. **Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue immediately by informing the Designated Safeguarding Lead or a deputy.** Rachel York-Forward, Deputy DSL, is also our Senior Mental Health Lead (Wellbeing Lead). If a mental health concern is not a safeguarding concern it is still essential that staff follow up their concerns. In the first instance, they should speak with Helen Schofield (Headteacher and DSL) or Rachel York-Forward to discuss a plan to ensure that the child's needs are met and an appropriate plan is put in place. A referral form can be completed if felt appropriate. See also Policy 8.18 – Mental Health Policy.
- We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

7.1 Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: http://www.actionagainstabduction.org/ and www.clevernevergoes.org.

7.2 Children and the court system

Children are sometimes required to give evidence in criminal courts. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds.

7.3 Children who are absent from school

Knowing where children are during school hours is an extremely important aspect of safeguarding. All staff should be aware that children who are absent from school, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of

female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child being absent in the future. Staff should be aware of our school's absence procedures, as described below.

In response to the guidance in *Keeping Children Safe in Education 2024*, Copthill School has:

- staff who understand what to do when children do not attend regularly, and especially on repeat occasions;
- staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage;
- procedures to inform the local authority when we plan to take pupils off-roll when they:
    - leave school to be home educated;
    - move away from the school's location;
    - are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

We inform the local authority via the 'On Roll Register' of any pupil who is added or deleted from the admissions register.

All schools must inform their local authority of any pupil who is going to be deleted from the admission register where they:

• have been taken out of school by their parents and are being educated outside the school system e.g. home education;
• have ceased to attend 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 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.

The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are absent from education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or exploitation.

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Absence

Parents are asked to leave a message on the school telephone's answering machine or via email on each day of absence unless the absence has been planned and authorised.

If staff have any queries regarding a child who they think should be in school, they should contact the Office immediately so a telephone call can be made to the parents.

An absence should only be authorised on receipt of a telephone message or an email message from the adult responsible for that child. No message can be accepted from other parents or the child themselves.

An empty circle on the register is an unauthorised absence. An unauthorised absence is one which has not been explained to the School. The registers are checked every morning and a parent/carer is contacted after 9.05am if an absence is unexplained. We will always follow up with parents/carers when pupils are not at school. We have at least two up-to-date contacts numbers for parents/carers. Parents are reminded to update the school as soon as possible if the numbers change.

Registers are carefully monitored to identify any trends. We address poor or irregular attendance with parents.

Copthill School will inform both the local authority where the school sits and the local authority where the child is normally resident of any pupil who fails to attend 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. Further information can be found here: Children missing education statutory guidance.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

7.4 Children with family members in prison

Copthill School understands that children with a parent(s) in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. They may require specific services and support. Families and children of people in prison will be seen as families first and school will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

7.5 Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

a) in exchange for something the victim needs or wants,
and/or

b) for the financial advantage or increased status of the perpetrator or facilitator.

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

Indicators of child sexual exploitation may include:

- acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- gang-association and/or isolation from peers/social networks;
- exclusion or unexplained absences from school, college or work;
- leaving home/care without explanation and persistently being absent, going missing or returning late;
- excessive receipt of texts/phone calls;
- returning home under the influence of drugs/alcohol;
- inappropriate sexualised behaviour for age/sexually transmitted infections;
- evidence of/suspicions of physical or sexual assault;
- relationships with controlling or significantly older individuals or groups;
- multiple callers (unknown adults or peers);
- frequenting areas known for sex work;
- concerning use of internet or other social media;

- increasing secretiveness around behaviours;
- self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

- having a prior experience of neglect, physical and/or sexual abuse;
- lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- recent bereavement or loss;
- social isolation or social difficulties;
- absence of a safe environment to explore sexuality;
- economic vulnerability;
- homelessness or insecure accommodation status;
- connections with other children and young people who are being sexually exploited;
- family members or other connections involved in adult sex work;
- having a physical or learning disability;
- being in care (particularly those in residential care and those with interrupted care histories);
- sexual identity.

Although the vulnerabilities listed above increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited and that child sexual exploitation can occur without any of these issues.

More information can be found in Child sexual exploitation: definition and guide for practitioners (2017)

If staff identify children for whom child sexual exploitation may be a concern they will apply the usual referral process and child protection procedures and pass this information to the DSL. The DSL can then refer cases where relevant to the appropriate Customer Services Team.

Copthill School also appreciates that we have a role to play in sharing soft intelligence relevant to perpetrators of child sexual exploitation. Therefore if such information should come to light within school, the DSL will share this appropriately with the police by telephoning 101.

7.6 Child criminal exploitation (CCE): county lines and cybercrime

Criminal exploitation of children is a geographically widespread form of harm that can affect children both in a physical and virtual environment.

Child criminal exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

a) in exchange for something the victim needs or wants,

and/or

b) for the financial advantage or increased status of the perpetrator or facilitator,

and/or

c) through violence or the threat of violence.

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

Some of the following can be indicatiors of child criminal exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional wellbeing;

- children who misuse drugs and alcohol;
- children who are absent or missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

County lines criminal activity: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'.

Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Key to identifying potential involvement in county lines are episodes of school absence, when the victim may have been trafficked for the purpose of transporting drugs. Copthill School will consider whether a referral to the National Referral Mechanism (NRM) should be undertaken in order to safeguard that child and/or other children. First responders' organisations, e.g. the local authority, can complete the referral on the schools behalf, online. If school feels that the threshold is not met for an NRM referral then any relevant information will be shared using a Partnership information report (Operation Insignia).

Cybercrime involvement: Organised criminal groups or individuals exploit children and young people due to their computer skills and ability, in order to access networks/data for criminal and financial gain.

There are a number of signs that may indicate a pupil is a victim or is vulnerable to being exploited which include:

- absence from school
- Show signs of other types of abuse/aggression towards others
- Have low self-esteem, and feelings of isolation, street or fear
- Lack trust in adults and appear fearful of authorities
- Have poor concentration or excessively tired
- Become anti-social
- Display symptoms of substance dependence

- Excessive time online computer/gaming forums
- Social Isolation in school with peers
- High-functioning with an interest in computing

This is not an exhaustive list and staff at Copthill School are aware of other factors which may also impact on the child. Like with all other safeguarding concerns, if our children are in this situation, support will be provided through the school. Please refer to useful contacts for further advice and support regarding concerns of this nature.

7.7 Modern slavery and the National Referral Mechanism
Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance - modern-slavery-how-to-identify-and-support-victims

7.8 Serious violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal network or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provides in the following guidance:

- https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence
- https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

7.9 Carrying knives/offensive weapons and gang culture

Bringing and carrying a knife/offensive weapon onto school premises is a criminal offence and immediate action will be taken by calling the police and informing all relevant personnel. The government guidance The DfE guidance on Searching, Screening and Confiscation Advice for Schools will be consulted and the school will consider and may apply the disciplinary procedure. If a member of staff suspects a pupil is involved in gang culture, this is a safeguarding concern and will require a discussion with the DSL who will seek advice from agencies and professionals including reference to the safeguarding procedures as outlined by the local authority. The pupil may be an exploited child and victim to whom the school will offer support.

7.10 Domestic abuse (DA) and Operation Encompass

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition: The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse;

(b) violent or threatening behaviour;

(c) controlling or coercive behaviour;

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

If staff identify children for whom Domestic Abuse may be a concern they should apply the usual referral process and Child Protection procedures and pass this information to the DSL. The DSL can then refer cases to the relevant local authority Customer Services.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day, on 0808 2000 247.

Further guidance is available here:

- Domestic abuse resources – Professional resources (lincolnshire.gov.uk)
- email domesticabuse@lincolnshire.gov.uk
- LDASS - EDAN Lincs Domestic Abuse Service
- email info@ldass.org.uk
- Tel: 01522 510041

Operation Encompass

Operation Encompass is a national police-led initiative to notify schools, prior to the start of the next school day, when a child or young person has experienced any domestic abuse. The police officer attending a domestic abuse incident will record at the scene the names and school of any children in the household. This will result in an email notification to the DSL and Deputy DSLs in our school in readiness for the start of the next school day. We will not discuss the domestic abuse notification with the parent. The information is limited and therefore does not safely allow any such discussion and we could increase the risk by discussing with the child, or parents of the child. We will, however, talk to parents about the situation should they wish to raise this with the school.

Further guidance on what to do and the resources we may require are located via https://www.lincolnshire.gov.uk/domestic-abuse. If we are unsure whether our concerns need to be reported to Children's Services, we will contact 01522 782111 (or the relevant Customer Services if not Lincolnshire) and request a consultation with a social worker, which will be arranged for the

following working day. If we notify the parents that we wish to discuss the situation with Children's Services, the consultation can be recorded on the child's record and the social worker can review any relevant history beforehand. If we do not notify the parents, a hypothetical consultation can be held, though the social worker will only have the information available during the discussion.

If the child referred to in the email does not attend our school and we have been sent a notification in error, we will report this to OperationEncompass@lincs.pnn.police.uk

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available Monday-Friday, 8am-1pm on 0204 5139990.

7.11 Homelessness

Being homeless or at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies should be aware of contact details and referral routes in to the Lincolnshire Housing Authority so they can raise/progress concerns at the earliest opportunity. Homeless Reduction Act Factsheets summarise the new duties that focus on early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

7.12 The Marriage and Civil Partnership (Minimum Age) Act 2022

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023, meaning that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. It is an offence to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families. Any concerns should be referred to the DSL.

7.13 So-called 'honour-based' abuse (HBA), including Female Genital Mutilation and Forced Marriage

So-called 'honour-based abuse' (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called 'honour-based' abuse are abuse, regardless of the motivation, and should be handled and escalated as such. Professionals in all agencies need to be alert to the possibility of a child being at risk from honour-based abuse, or already having suffered honour-based abuse.

Where staff are concerned that a child might be at risk of honour-based abuse, they must contact the DSL as a matter of urgency.

7.14 Female Genital Mutilation/FGM

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is child abuse with long-lasting harmful consequences and is illegal in the UK.

The Serious Crime Act 2015 sets out a **legal duty** on all regulated professionals, including **teachers** or persons who are employed or engaged to carry out teaching work in schools, **to notify police when they discover that FGM appears to have been carried out on a girl under 18**. In schools, this will usually come from a disclosure. It will be rare for staff to see visual evidence, and they should not be examining pupils or students.

Whilst **all staff** should speak to the DSL (or deputy) with regard to any concerns about FGM there is a specific **legal duty on teachers**. If a **teacher**, in the course of their work in the profession, **discovers that an act of FGM appears to have been carried out on a girl under the age of 18,**

the teacher must personally report this to the police. This is a **personal duty** and cannot be transferred to anyone else. Unless staff have a good reason not to, they should also discuss any such case with the DSL and involve children's social care as appropriate.

The mandatory reporting duty is related to a disclosure that **FGM has already happened** and this should be **reported to the police on 101. Where there is a risk to life or likelihood of serious immediate harm**, professionals should report the case immediately to police, including dialling **999** if appropriate. In most cases, reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. Those failing to report such cases will face disciplinary sanctions.

Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information

The mandatory reporting duty does not apply in relation to at risk or suspected cases. Where a girl discloses information that identifies her as at risk of FGM, professionals should follow the normal safeguarding procedures.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Staff should not assume that FGM only happens outside the UK.

Risk factors for and symptoms of FGM include:

- low level of integration into UK society;
- mother or a sister who has undergone FGM;
- girls who are withdrawn from PSHE;
- visiting female elder from the country of origin;
- being taken on a long holiday to the country of origin;
- talk about a 'special' procedure to become a woman.

FGM may be likely if:

- there is a visiting female elder;
- there is talk of a special procedure or celebration to become a woman;
- parents wish to take their daughter out of school to visit an 'at-risk' country, especially before the summer holidays;
- parents wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- frequent urinary, menstrual or stomach problems;
- prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- reluctance to undergo normal medical examinations;
- confiding in a professional without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

7.15 Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible

practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

Staff at Copthill School understand that this is a potential safeguarding issue and, therefore, they will pass on concerns by applying the usual referral process and Child Protection procedures.

The Forced Marriage Unit can be contacted on 020 7008 0151 for advice or information and has published statutory guidance - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf

7.16 Preventing radicalisation, The Prevent Duty and Channel

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Copthill School adheres to the Prevent Duty Guidance for England and Wales.

Copthill School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people susceptible to future manipulation and exploitation.

Copthill School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

We assess the risk of children being drawn into terrorism and identify who may be at risk of radicalisation. A referral of those susceptible to being drawn into terrorism will be made to Channel. Any referral needs the individual's consent.

<u>School and curriculum ethos</u>

Our broad and balanced curriculum and all other activities, will promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We use the curriculum to ensure that children understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum which aims to prepare them for life in modern Britain. Emphasising the characteristics of the Copthill Learner alongside the fundamental British values supports quality teaching and learning whilst making a positive contribution to the development of a fair, just and civil society.

Prevention work and reductions of risks will include the RE curriculum, PSHEE curriculum, SEND Policy (Policy 3.20), assemblies, the use of school premises by external agencies, integration of pupils by gender and SEN, Anti-bullying Policy (Policy 6.1) and other issues specific to the school's profile, community and philosophy.

<u>IT policies</u>

Radicalisation will also be considered within current online safety policies, procedures and curriculum in terms of having suitable filtering and monitoring in place and also raising awareness with staff, parents and children about the increased risk of online radicalisation, through the use of the internet, social media and gaming.

We will ensure that children are safe from online terrorist and extremist material, typically via appropriate levels of filtering. Pupils and staff must abide by our IT Charter which makes clear that accessing sites which promote online terrorist and extremist material is unacceptable. Using school equipment to send terrorist publications to others would be a criminal offence. The school has appropriate filtering and firewalls and internet searches are regularly monitored.

Recognising extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies outside school;
- evidence of possessing illegal or extremist literature;
- advocating messages similar to illegal organisations or other extremist groups;
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- graffiti, art work or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;
- verbalising anti-Western or anti-British views;
- advocating violence towards others.

Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or deputy making a Prevent referral.

Staff training

The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

Copthill School will ensure that our staff are equipped to identify children at risk of being drawn into terrorism, as well as challenge extremist ideas, through training. They should know how to refer children and young people for further help.

All staff undertake PREVENT e-learning via Smartlog.

Additional support

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed e-learning training courses accessible via Prevent duty training

Educate Against Hate is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

Referral process

Where staff are concerned that children are developing extremist views or showing signs of becoming radicalized, they should discuss this with the DSL, following the usual referral process and child protection procedures.

The DSL will seek advice and support in one of the following ways:

- Lincolnshire Police Prevent Officer
    - 01522 558304
    - CTP-EM-Prevent@lincs.pnn.police.uk
- LCC Prevent Lead
    - prevent@lincolnshire.gov.uk

The Prevent Officer will then assist the DSL regarding whether a referral is appropriate and whether this child or family will need to be referred to the Channel Panel - Channel guidance. Any referral needs the individual's consent.

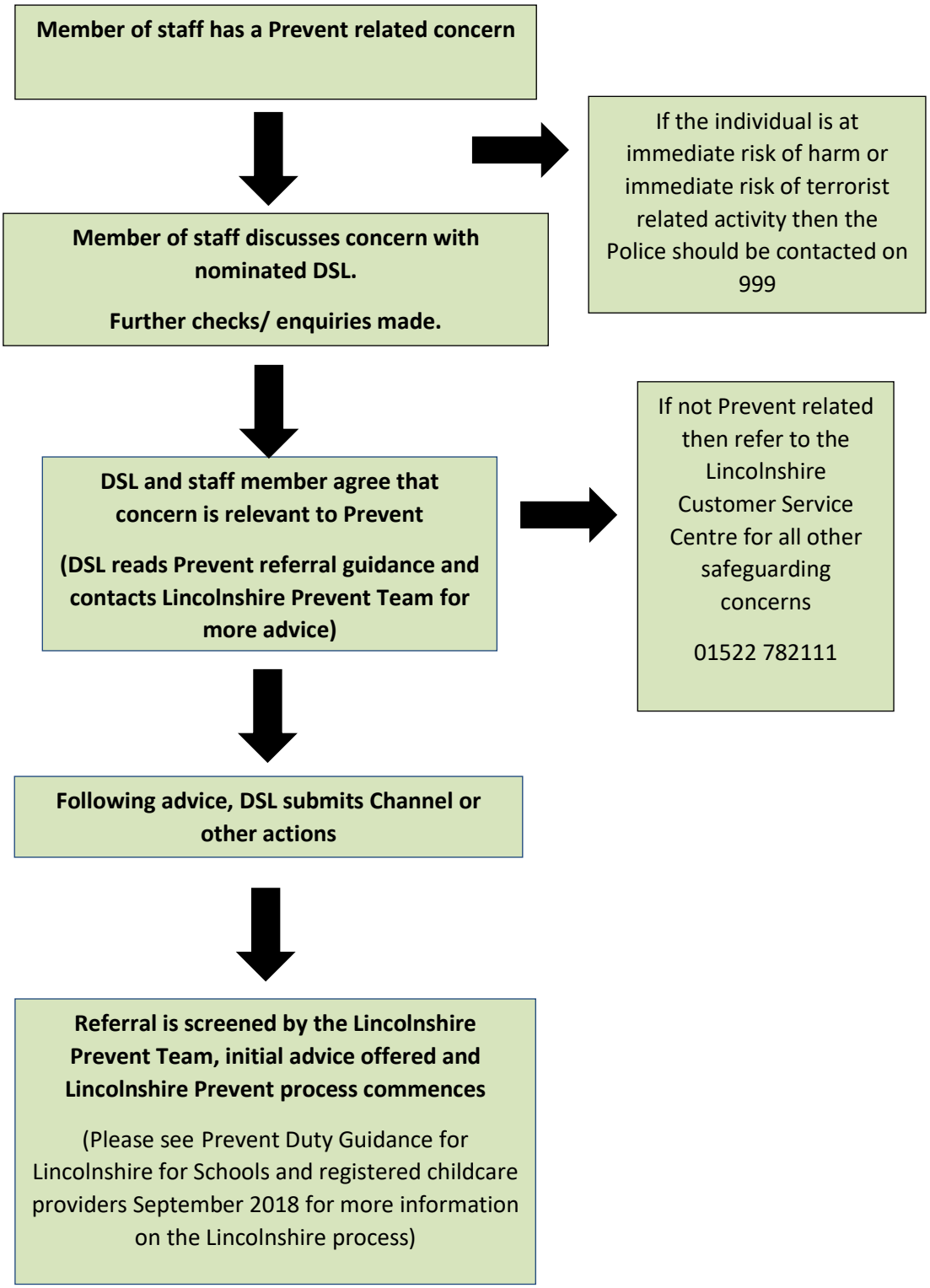
For further local guidance we refer to the Lincolnshire LSCP document, Supporting Children and Young People Vulnerable to Violent Extremism.

EMTET is the Ethnic Minority and Traveller Education Team who can support settings by working with individuals who are victims of racism or are perpetrators of racism or have racist views. In addition, they can signpost settings to other organisations which will be able to provide support with other similar issues. EMTET contact details are 01427 787190 - https://www.lincolnshire.gov.uk/parents/schools/sen/support-services/ethnic-minority-and-traveller-education-team/

Monitoring and enforcement

ISI inspectors will assess the setting's approach to keeping children safe from the dangers of radicalisation and extremism and what is done when the setting suspects that pupils are vulnerable to these threats. If our setting is considered to be failing in this regard, or if our children or staff's safety is threatened, the School must remedy any failing or be subject to regulatory action. Early Years settings are also covered by this monitoring provision.

Lincolnshire Prevent referral pathway



7.17 Child on child abuse

At Copthill School, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Promoting Positive Behaviour Policy (2.6).

Children and young people may be harmful to one another in a number of ways which would be classified as child on child abuse. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviours and and an unsafe environment for our children. Different gender issues can be prevalent when dealing with child on child abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation-type violence. We recognise that it is more likely that girls will be victims and boys perpetrators **but all child on child abuse is unacceptable and will be taken seriously**. It is important that staff challenge abusive behaviours between peers.

Types of abuse

Safeguarding issues can manifest themselves via child on child abuse. There are many forms of abuse that may occur between children and this list is not exhaustive:

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- bullying, including prejudice-based and discriminatory bullying - physical, name-calling, homophobic etc.
- online bullying;
- gender-based violence;
- abuse in intimate personal relationships between peers;
- sexually harmful behaviour/sexual abuse e.g. inappropriate sexual language, touching, sexual assault etc.;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (sexting or youth-produced sexual imagery);
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification, distress or alarm;
- initiation/hazing-type violence and rituals.

We develop appropriate strategies in order to prevent the issue of child on child abuse rather than manage issues in a reactive way.

Occasionally, allegations may be made against children by others in the school which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other pupils in the school;
- indicates that other pupils may have been affected by this student;

- indicates that young people outside the school may be affected by this student.

We recognise that child on child abuse can and will occur in any setting even with the most stringent of policies and support mechanisms, in which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting our pupils to talk about any issues and through sharing information with all staff. We support this by ensuring that our school has an open environment where pupils feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive Relationships Education and PHSEE curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

Children should be able to confidently report abuse, knowing their concerns will be treated seriously.

We recognise that, even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.

Expected action taken by all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, we follow simple steps to help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example, we do not use the word perpetrator, as this can quickly create a 'blame' culture and leave a child labelled.

All staff are trained in dealing with such incidents, talking to pupils and instigating immediate support in a calm and consistent manner. Staff are not prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

All concerns and/or incidents are recorded and shared with the DSL. Information is shared appropriately with parents/carers. Support must be provided for victims, initiators and any other children affected.

7.18 Body Shape

Young people come under increasing pressure to conform to so-called ideals by peers, adults, sometimes parents, the mass media, through social media and through their own view of themselves. Research shows more than half of young people worry about the way they look, and this can lead to withdrawal, isolation, emotional and at its extremes serious physical harm. We work to tackle these values, support individuality and teach body confidence at the school and encourage young people to work together to present a positive and healthy view of body shape.

7.19 Bullying

Bullying is a form of abuse and can cause serious anxiety and distress leading to poor attendance at school and further safeguarding risks. It comes in many different forms, detailed in this policy. All bullying, including online bullying and prejudice-based bullying, must be reported and will be managed through our anti-bullying procedures. The school will make a child protection referral if required. Staff are trained to deal with bullying within the school and support children who are being bullied. Staff recognise the different levels of bullying and the seriousness of racist, homophobic and gender-related bullying. We recognised that, whilst those who are bullying may need sanctions put in

place, we also recognise that they may be in need of support and we will engage with appropriate services to address this.

7.20 Sexual violence and sexual harassment

Staff are aware of sexual violence and sexual harassment and that children can, and sometimes do, abuse their peers in this way.

Sexual violence refers to rape, assault by penetration and sexual assault as described in the Sexual Offences Act 2003.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Staff understand that when we reference sexual harassment we do so in a context of child-on-child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Part 5 of *Keeping Children Safe in Education 2024* and the LSCP policy, Child-on-child Sexual Harassment, Sexual Abuse and Sexually Harmful behaviours set out how schools should respond to reports of sexual violence and sexual harassment.

Neither is acceptable and will not be tolerated by the school. Copthill School takes all such reports seriously and they will receive the same high standard of care that any other safeguarding concern receives. A multi-agency approach will be undertaken when responding to all such complaints; however the school will always take immediate action to protect children despite the actions of any other agency. These actions may include an immediate risk assessment in respect of the needs of the child victim and will address any risks identified to any child in respect of an alleged perpetrator of sexual violence or sexual harassment to ensure children are protected from harm. Any risk assessment will be fluid and may change to reflect any developments during the management of the case. All such reports will be managed by the DSL.

There are a number of options the school may consider in respect of the management of a report of sexual violence or sexual harassment between children and each case will receive an appropriate bespoke response once all the facts are known. Irrespective of any potential criminal outcome, the school have a duty to safeguard all children and may deal with any such report on a balance of probability basis when considering the outcomes for children involved.

Any report of sexual violence will trigger the school to do a risk assessment to consider:

- the needs of the victim and their support and protection;
- any other potential victims;
- the perpetrators and,
- all other children, and if appropriate, students and staff if protection is required against the perpetrator.

A report of sexual violence or sexual harassment should include the time and location of the incident. The subsequent risk assessment will include any actions required to make the location safer.

This risk assessment does not replace those assessments carried out by professionals but helps the school decide on the next course of action, particularly in relation to keeping the victim and other potential victims safe from harm or distress. The assessment may result in reorganisation of classes, for example, to ensure that the victim and perpetrator and not in close proximity. It may be necessary to consider a move to an alternative school or educational setting based on the risk assessment or the decision of the court. Any decisions will be made based on the wishes of the victim, the nature of the incident and the safety of others. Actions will be taken immediately to reduce risk and undue distress and assessments will be reviewed regularly.

The outcome of a report of sexual violence may be that we will manage the situation within our own processes, request early help from the local authority, report the incident to social care or report to the Police. All reports will be reviewed and potential lessons to be learnt by the school will be considered.

We recognise in our school that reporting of the above can be difficult for children. Therefore, we provide a range of ways in which children can let us know of their concerns and we will promote these regularly. However, there might be a situation where the young person asks the school not to tell anyone about the incident. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. Advice should be sought from the DSL (or a deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. If the DSL (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.
Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.

As a matter of effective safeguarding practice, Copthill School will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. Sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Part 5 of *Keeping Children Safe in Education 2024* outlines the unique challenges regarding social media along with potential support.

We will adopt an understanding that it could and is most likely happening in our school and not depend on reporting to dictate actions. We will develop a 'zero tolerance' approach and not judge any disclosure as 'low level' or acceptable. We understand that child on child abuse does not only happen in school but also outside of the setting and online. The way we respond to a concern is likely to have a long lasting impact on how others react if they wish to disclose therefore we are very aware of ensuring appropriate support is in place. We will continue to reflect on our approaches using the experiences of children and families to guide this. If we find the information to be false, unfounded or malicious, we will also reflect and act on if necessary, why this disclosure was made and any

potential 'cry for help' that could escalate into a safeguarding concern. Support will also be considered for the perpetrator in order to reduce harmful behaviour and potential risk to others. It is also important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

Our Promoting Positive Behaviour Policy also outlines the processes followed by the school and staff have undertaken training regarding the implementation of the policy and read it.

7.21 Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Staff should always act in the best interests of a child and follow usual safeguarding procedures. Additional information can be found at Upskirting: Know your rights.

7.22 Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (sexting or youth-produced sexual imagery)

We have a duty of care towards our pupils and an obligation to support them in being safe in the online world as well as the physical world.

Where there is a disclosure or the school becomes aware that a child may have been involved in sending nudes or semi-nudes images or videos which is sometimes referred to as 'sexting', we will refer to the guidance in the document sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people published by the UK Council for Child Internet Safety (2024). This guidance was updated in March 2024 to specifically include images created by artificial intelligence (AI)

Staff understand that, when an incident comes to their attention, the incident should be referred to the DSL as soon as possible. The DSL will then hold an initial review meeting with appropriate school staff and subsequent interviews with the young people involved (if appropriate). Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately

We will refer to the following guidance if appropriate:
The DfE guidance on Searching, Screening and Confiscation Advice for Schools

7.23 Online safety

At Copthill School, we use technology and the internet extensively across all areas of the curriculum. It is essential that children are safeguarded from potentially harmful and inappropriate online material. Potential online risks can be grouped into 4 categories:

- **Conduct** - children may be at risk because of their own behaviour, for example, by sharing too much information
- **Content** - age-inappropriate or unreliable content can be available to children
- **Contact** - children can be contacted by bullies or people who groom or seek to abuse them
- **Commerce** - young people can be unaware of hidden costs and advertising in apps, games and websites

The Directors, working alongside the DSL and Online Safety Coordinator, will ensure appropriate filters and monitoring systems are in place, which are reviewed at least annually and/or when a safeguarding risk is identified, there is a change in working practice and/or new technology is introduced and provide advice to parents about safely accessing online learning out of school.

As part of our staff safeguarding training, staff receive training about online safety which includes applicable roles and responsibilities and expectations in relation to filtering and monitoring.

Staff will ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad curriculum. To help our pupils understand how to stay safe and behave appropriately online, and as part of existing curriculum requirements, staff are aware of the DfE guidance Teaching online safety in schools. We also make use of UKCIS Education for a connected world framework. Staff will monitor pupils IT habits to identify pupils who may be at risk from the internet.

In order to safeguard pupils and to prevent loss of personal data we employ the following assistive technology:

- **Internet Filtering**- we use software that prevents unauthorized access to illegal websites. It also prevents access to inappropriate websites. Appropriate and inappropriate is determined by the age of the user and will be reviewed in line with this policy or in response to an incident, whichever is sooner. The ICT Lead/Online Safety Coordinator and IT support are responsible for ensuring that the filtering is appropriate and that any issues are brought to the attention of the Headteacher.
- **Email Filtering** – we use Gmail which provides a basic filtering service for all staff using spam. Pupils have no access to outside emails.

Boundaries for pupils using of ICT equipment and services in this school are given in the Pupil Charter of Good ICT Behaviour (PCGIB). Any deviation or misuse of ICT equipment or services will be dealt with in accordance with the Promoting Positive Behaviour Policy (2.6). All students from Year 3 to Year 6 are introduced to the PCGIB to help understand it and then sign it.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are reviewed at least annually and/or when a safeguarding risk is identified, there is a change in working practice and/or new technology is introduced to ensure effectiveness. Pupils do not use personal mobile technology, such as tablets or mobile phones, in school so are unable to access the internet using their own data plan. Should a child be found to be using a personal device in school, the device is confiscated, locked away securely and returned to the parent or carer. The Promoting Positive Behaviour Policy is followed.

Outside of school, our children are increasingly using mobiles phones, tablets, and computers on a daily basis. While mobile devices are a source of fun, entertainment, communication, and education we know that some adults and young people will use these technologies to harm young people. The harm might range from hurtful and abusive messages directed at them, inappropriate and harmful content, to enticing young people to engage in sexually harmful conversations, video calls, indecent image sharing or face-to-face meetings. Our Online Safety Policy explains how we try to keep young people safe. Staff will immediately report concerns to the DSL.

Gaming networks, messaging apps and social media are the more obvious sources of inappropriate and harmful behaviour and young people cannot access these on our IT system. We will work with young people on how to maintain their own safety and how to summon help if they are concerned about what they see online. Some young people will undoubtedly be chatting through apps or social media at home and parents are encouraged to consider measures to keep their young people safe. Information on parental controls can be found at https://www.internetmatters.org/

The Staff Code of Conduct provides further advice and guidance regarding the use of social networking and electronic communication with young people in our care.
The DfE guidance Teaching online safety in schools is useful to help ensure our children understand how to stay safe and behave online, as is UKCIS Education for a connected world framework

Online safety is embedded into our curriculum. All pupils from Reception through to Year 6 are involved in an Online Safety Week in school to highlight potential dangers of technology and how to use it safely. Pupils are given appropriate advice and guidance by staff across all areas of the curriculum. Similarly all pupils will be fully aware how they can report areas of concern whilst at school or outside of school.

7.24 Contextual safeguarding

Copthill School assesses the risks and issues in the wider community when we consider the well-being and safety of our pupils. We recognise that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school.

Children can also be 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.

All staff, but especially the DSL and deputies, will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. The school will provide as much information as possible to children's social care as part of any referral undertaken.

https://www.contextualsafeguarding.org.uk/

7.25 Children who may require Early Help

Putting Children First: Meeting the Needs of Children and Families in Lincolnshire is Lincolnshire's safeguarding model based on Signs of Safety.

All staff and volunteers working within Copthill School are aware safeguarding is not just about protecting children from deliberate harm, neglect and failure to act. Early Help is defined as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later.
Early Help is about providing the right help, at the right time, in the right place. Our belief is that children and young people are best supported by people they know and trust.

All children and young people may need extra help and support at some point in their lives. All of us are committed to continuing to identify and provide support to children and young people who are at risk of poor health and wellbeing.

Copthill School identifies who our vulnerable children are, ensuring all staff and volunteers know the processes to secure advice, help and support where needed.

Early Help

Working together to safeguard children (2023) identifies the critical features of effective Early Help as:

A multi-disciplinary approach that provides:

- a range of practice that empowers families and helps them to develop the capacity to resolve their own professional skills and expertise through a "Team around the Child" approach.
- a relationship with a trusted lead professional who can engage with the child and their family, and coordinate the support needed from other agencies.
- a holistic approach that addresses the children's needs in the wider family context.
- a simple, streamlined referral and assessment process.

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

We refer to the guidance for Early Help at www.lincolnshire.gov.uk/tac or seek help via TACadmin@lincolnshire.gov.uk or earlyhelpconsultants@lincolnshire.gov.uk

The Family Services Directory is a useful tool when discussing early help, it can be accessed here - Lincolnshire Family Services Directory (lincsfamilydirectory.org.uk)

What is Team Around the Child (TAC)?

TAC is a shared assessment and planning framework which is in use by a variety of agencies across the county and is employed in similar format throughout the country. It aims to help with the early identification of additional needs of children and young people and promote a co-ordinated multi agency response to meet them. TAC can be used to support children and young people between 0–19 years, including unborn babies and can also be used with consent up to the age of 24 where a young person has a learning difficulty or disability. There are four main stages in setting up a TAC:

- Early identification of needs.
- Assessing strengths and needs in a consistent and methodical framework.
- Developing and delivering an integrated service.
- Reviewing and refining the support arrangements.

Early Help in Lincolnshire includes both the TAC and ESCO process. Signs of Safety is embedded throughout. ESCO is similar to the TAC process but specifically supports the care coordination of Children with Disabilities (CWD) Further information can be seen at www.lincolnshire.gov.uk/ESCO

Early Help Advisors are available to support professionals. These advisors are based within Customer Service Centre (01522 782111). They offer consultations to professionals for new cases where practitioners need some advice or guidance. The Advisors are qualified social workers who will advise on all levels of safeguarding and thresholds.

Early Help Consultants provide support, advice and guidance to lead professionals on existing TAC Cases. They will use Signs of Safety methodology to map and/or quality assure cases in order to secure improved outcomes for children, young people and their families. Contact earlyhelpconsultants@lincolnshire.gov.uk

TAC Administrators provide administrative support, maintain records, monitor processes, and can signpost professionals to local services. Contact TACadmin@lincolnshire.gov.uk

The **DSL** acts as the focal point for all matters concerning child protection and safeguarding children and young people. One of the primary tasks is to act as the contact between school, the family and other agencies. Incidents of possible child abuse obviously need to be handled with sensitivity and confidentiality consistent with the multi-disciplinary approach. If there is any cause for concern whatsoever it is vital that information is passed to the DSL immediately. In the event, following statutory investigation, of concerns proving to be unfounded, staff should not reproach themselves for having raised the issue. In cases of this nature it is always better to be safe than sorry.

7.26 Supporting vulnerable pupils at risk, including those with special educational needs (SEN) and/or disabilities or certain health conditions

Special consideration should be given to safeguarding and protecting children that may have additional vulnerabilities, for example children that are in care (looked after) or those with special educational needs (SEN) and disabilities or certain health conditions. Awareness of our obligations under the Human Rights Act 1998 and Equality Act 2010 is particularly important for those children with SEND.

Additional safeguarding challenges and barriers to the recognition of abuse, neglect and exploitation can exist, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

- vulnerable children, including those with special educational needs and/or disabilities or certain health conditions, can be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges, and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs;
- living in a domestic abuse situation;
- young carers;
- affected by parental substance misuse;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaged in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language.

Copthill School will endeavour to support vulnerable pupils through:

- its ethos which promotes a positive, supportive and secure environment, giving pupils a sense of being valued;
- its Promoting Positive Behaviour Policy (Policy 2.6) aimed at supporting vulnerable pupils in school. All staff will agree a consistent approach which focuses on the behaviour of the offence committed by the child, working to support children in developing positive behaviour;
- taking into account filtering and monitoring of access to the internet for vulnerable children, assessing risk and including on individual learning plans;
- liaison with other appropriate agencies which support the pupil;
- developing supportive relationships;
- recognition that children living in difficult home environments are vulnerable and are in need of support and protection;
- monitoring pupil welfare, keeping accurate records and notifying appropriate agencies when necessary;
- allowing designated staff opportunity to attend face to face Safeguarding in Schools briefings/LSCP multi-agency training. (For example, Prevent, Child Sexual Exploitation guidance, domestic abuse, drugs/alcohol substance misuse etc.);
- ensuring information is transferred safely and securely when a pupil with a Safeguarding Record of Concern transfers to another school. Also notifying key workers or social workers where a child leaves the school (as appropriate);
- following Lincolnshire's procedures for Child Sexual Exploitation including using the CSE Risk Assessment Toolkit as necessary.

Lincolnshire SEND offer is available for every child and family in Lincolnshire.

7.27 Children who are lesbian, gay, bisexual, or gender questioning

N.B. This section remains under review by the government, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At Copthill School, we endeavour to reduce the additional barriers faced by providing a safe space for them to speak. Our pastoral structure is strong, including form and subject teachers, personal tutors (Years 5 and 6), teaching assistants and HLTAs, a Wellbeing Lead and Pastoral Coordinator.

7.28 Children in Care and Children Previously in Care (Looked After Children and Previously Looked After Children)

All staff recognise that children in care and care leavers are more vulnerable than other children, often having poorer educational outcomes. Therefore, ensuring their well-being, safety and welfare is of paramount importance, as well as helping them to be the best they can be, including the child who is moving out of care.

Copthill School's designated teacher with responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales in addition to Children in Care (Looked After Children (LAC)) is Anne Teesdale.

Advice can be sought from the Lincolnshire Virtual School – virtualschool@lincolnshire.gov.uk

Queries are communicated directly to the child's social worker until they are 17 years 6 months, after which they are transferred to Lincolnshire Leaving Care Service.

7.29 Young Carers

We recognise that there may be children within our school who act as young carers for someone they are related to or know. To provide support to them with this we will contact and work with the Lincolnshire Young Carers Service to ensure that the young carer is recognised, valued and

supported to have good health and wellbeing and to achieve their full potential.
youngcarers@lincolnshire.gov.uk

7.30 Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse, neglect and exploitation, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

7.31 Pre-Birth Protocol

Section 11 of the Children Act 2004 requires agencies to have in place mechanisms to ensure that they are able to safeguard and promote the welfare of children.

All practitioners whether adult or children services, have a responsibility to protect and safeguard children and work collaboratively with Children's Services and other childcare professionals in contributing to assessments and interventions. Therefore, the professional who is first made aware of the pregnancy should initiate the pre-birth protocol and complete an Early Help Assessment, or make a referral for unborn to Social Care.

A young person of statutory education age is entitled to 18 weeks of maternity leave. Either side of this period there is an expectation that the young person continues to attend school or alternative provision. The educational establishment is required to make all reasonable adjustments to allow the young person to have appropriate access to the curriculum whilst they attend the establishment including timetable and learning environment adjustments. It is important that the provision participate in the Team Around the Child (see Team Around the Child Supporting Documentation,) in order for them to fully support the continued education of the young parent. Education establishments should have a clear strategy for engaging with the young person while they are away from the provision so as to limit the disruption to their education and make appropriate arrangements that work for the young person and educational establishment. Where there is robust medical evidence that indicates that the young person is unfit to attend, the educational establishment can make a referral to the pupil reintegration team on 01522 554525 who will assess and consider alternative arrangements if appropriate.

The Lincolnshire Pre-Birth Protocol link to the full document is below;

https://lincolnshirescb.proceduresonline.com/chapters/p_pre_birth_protocol.html?zoom_highlight=pre+birth+protocol

https://lincolnshirescb.proceduresonline.com/pdfs/pre_birth_flow_chart.pdf

Section 8 Other Relevant Policies and Information

Designated Safeguarding Lead Procedures/ Job Role – A detailed job description for the DSL is available – Policy 6.10 - Role of Designated Safeguarding Lead

Copthill School takes safeguarding seriously and understands this policy is over-arching. The School also maintains other linked policies in line with the legislative requirements; together these make up the suite of policies to safeguard and promote the welfare of children in this school.

Important Staff Guidance and Policies (references to Staff Handbook)

- Allegations against Staff- 6.16
- Anti-Bullying Policy- 6.1
- Complaints Procedure- 1.7
- Protection of Pupils' Data- 5.1
- Protection of Staff Data - 5.2
- Promoting Positive Behaviour Policy- 2.6
- eSafety Policy - 5.4
- Health and Safety Policy – 7.5
- Induction of New Staff in Safeguarding - 6.3i
- Mental Health Policy – 8.18i
- Recruitment & Selection Policy - Personnel Handbook 1.9
- Registration Policy- 1.18
- Restraint Policy- 6.4i
- SEND Policy - 3.20
- Social Networking Advice - 5.8
- Staff Code of Conduct- 6.13
- Whistleblowing Policy - 6.15i

Other Important Links to Guidance / Legislation

- Behaviour in Schools: advice for Headteachers and school staff
- Children Act 1989 and Children Act 2004
- Children missing education - September 2016
- Data protection: toolkit for schools - August 2018
- Developing and implementing a low-level concerns policy
- Disqualification under the Childcare Act 2006 - revised September 2018
- The Domestic Abuse Act (2021)
- Education Act 2002
- The Equality Act 2010: Advice for Schools
- Governance handbook and competency framework March 2019
- Guidance for safer working practice for those working with children and young people in education settings - 2022
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018
- Keeping children safe in education - September 2024
- Mental health and behaviour in schools - November 2018
- modern-slavery-how-to-identify-and-support-victims
- The Prevent duty: Departmental advice for schools and childcare providers - June 2015
- Regulated activity in relation to children
- https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
- Searching, screening and confiscation
- sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
- Teaching online safety in schools
- Teaching Standards
- Child abuse concerns: guide for practitioners

- Working Together to Safeguard Children - 2023

Safeguarding Contacts

Advice on any aspect of Child Protection and Safeguarding may be sought from the Safeguarding Team

Designated Safeguarding Lead	**HELEN SCHOFIELD Headteacher *07527859853***
Deputy Safeguarding Leads	**RACHEL YORK-FORWARD *01780 757506***
*If the Designated Safeguarding Lead & Deputies are not available, contact **Jonathan Teesdale (Safeguarding Director 07801 585301), a member of the SLT and/or take advice from children's social care**. Reporting suspicion of child abuse should not be delayed.* **Our local contact numbers are:**	
Safeguarding of children concerns *(Children living in Lincolnshire)*	**01522 782111** (Mon-Fri 8am-6pm) *Lincolnshire's Children's Services Customer Service Centre for reporting concerns and Early Help Team for Advice* **01522 782333** (Mon-Fri 6pm-8am, weekends and Bank Holidays) - *Emergency Duty Team*
Safeguarding of children concerns *(Children living in other authorities)* You can make a referral directly to the **NSPCC** on telephone **0808 800 5000**	***Cambridgeshire Multi-Agency Safeguarding Hub (MASH)*** **0345 045 1362** (Mon-Thurs 8am-5.30pm / Fri 8am-4.30pm) **01733 234 724** (out of hours)
	Peterborough **01733 864180 / 01733 864170** (Mon-Fri 9am-5pm) **01733 234724** (out of hours)
	Rutland Children's Duty Team **01572 758407** (office hours) **0116 3050005** (out of hours)
	Northamptonshire Multi-Agency Safeguarding Hub (MASH) **0300 1261000**
Allegations against /concerns about adult(s) working with children	**Staff must report concerns to the Headteacher or, in the event of concerns about the Headteacher, concerns must be reported to the Safeguarding Director, Jonathan Teesdale. The Head/JAT must contact LADO to discuss concerns & course of action.** *Lincolnshire Local Authority Designated Officers (LADO)* **Paul Fisher, Kim Murray, Ildiko Kiss, Fiona Watters - 01522 554674** Local Authority Designated Officer (LADO) **OR** LSCP_LADO@lincolnshire.gov.uk
Police *(Emergency)* **Police** (Non Emergency)	**999** **101** **01522 947590** Lincolnshire Police Public Protection Unit, Central Referral Unit
LCC Safeguarding in Schools *for advice around safeguarding policy, audits, training etc.*	**Stefanie Knox** safeguardinginschools@lincolnshire.gov.uk

Extremism / Prevent Advice Relevant County Police: **101**

DfE Helpline: **02073407264** *Counter-extremism@education.gsi.gov.uk*

The NSPCC Whistleblowing Advice Line for Professionals – 0800 028 0285 – 8.00am to 8.00pm Mon-Fri and 9am-6pm at the weekends, and/or help@nspcc.org.uk

Appendix 2 Receiving disclosures

Receiving Disclosures:

Receive

- Listen, try not to look shocked or be judgmental
- Believe what they say 'take it seriously'.
- Accept what the young person says.
- Don't make them feel bad by saying "you should have told me earlier"
- Don't 'interrogate' them – let them tell you, try not to interrupt
- Note the date and time, what was done, who did it, and where it took place
- Use the young person's own words
- Don't criticise the perpetrator
- Don't take photographs of any injuries
- Don't ask leading questions – use 'open' questions to clarify only (T.E.D)

Tell me what you mean by that?/ Can you **T**ell me how that happened?

Explain that to me

Describe ….

Reassure

- Stay calm, tell the young person they've done the right thing in telling you
- Reassure them they are not to blame
- Empathise – don't tell them how they should be feeling
- Don't promise confidentiality, explain who needs to know
- Explain what you'll do next
- Be honest about what you can do

Report and Record

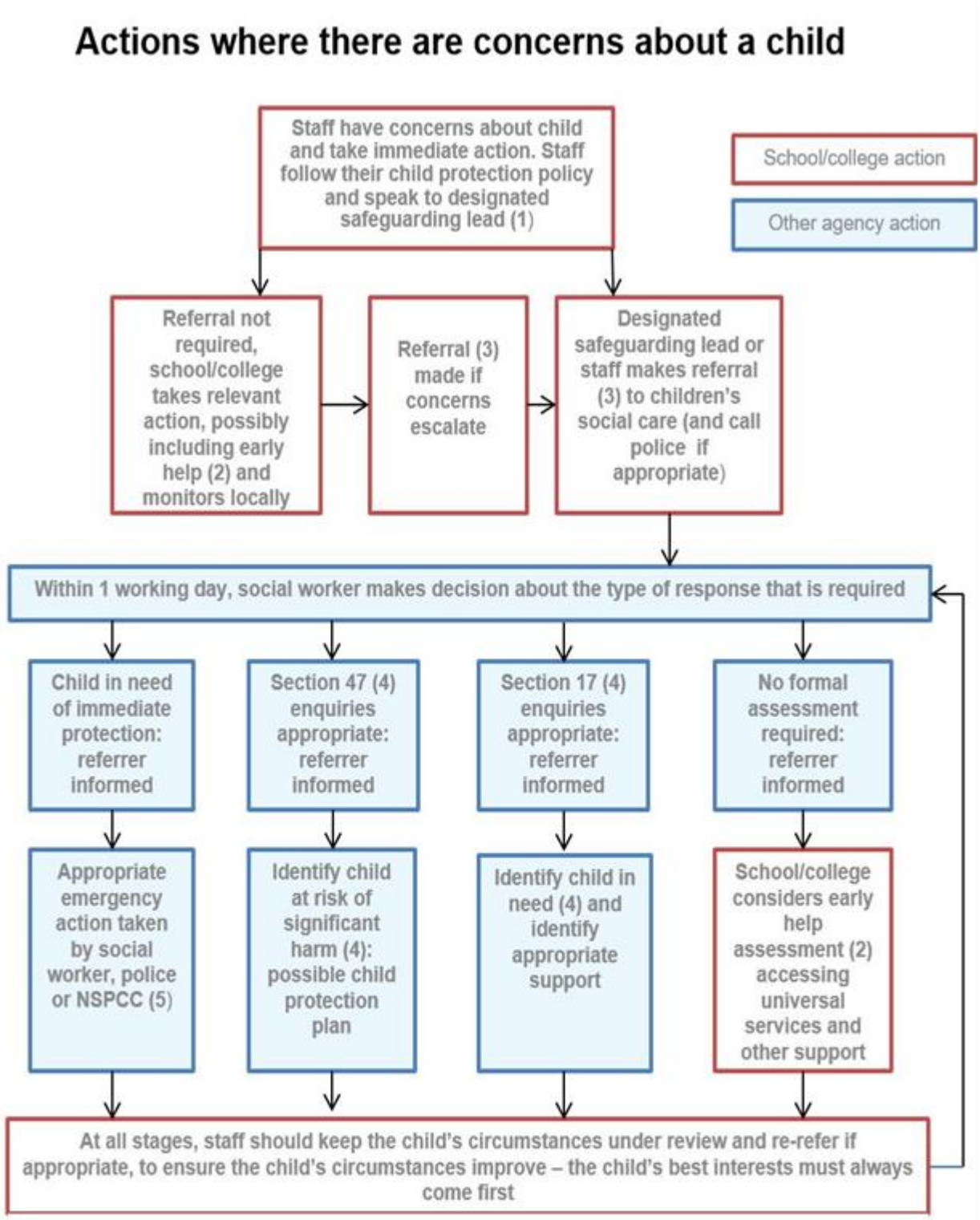
- Make a Brief, accurate, timely and factual record
- Discuss with the Designated Safeguarding Lead (DSL) or their Deputy, without delay
- The Designated Safeguarding Lead will assess the situation and decide on the next steps

Things to include:

- Time and full date of disclosure/incident and the time and full date the record was made
- An accurate record of what was said or seen
- Whether it is 1st or 2nd hand information
- Whether the child was seen/spoken to
- Whether information is fact/ professional judgement
- Full names and roles/status of anyone identified in the report
- Avoid acronyms/jargon/abbreviations
- Sign the record with a legible signature.
- Record actions agreed with/by the Designated Lead

Records should be reviewed regularly and any new concerns should be added and responded to immediately.

Appendix 3 Referral Flowchart from *Keeping Children Safe in Education 2024*



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

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of Working together to safeguard children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of Working together to safeguard children.

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix 4 Role of the Designated Safeguarding Lead (KCSiE Annex C)

Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school or college **leadership team,** is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to 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
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co- ordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health

- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.[156] This includes:
    - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

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[156] We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker, particularly in larger schools or colleges. Where this is the case, it is important that the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in Parts one and two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements[157]
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers[158]
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation

[157] Full details in Chapter one of Working Together to Safeguard Children.

[158] Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

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

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Appendix 5 – Remote Education Policy

Remote Education Policy for Copthill School

1. Statement of School Philosophy

Copthill School has always strived to be creative and resourceful and to support our parents/children in the best way possible to make learning purposeful and holistic. Our strategy for remote learning complements this.

2. Aims

This Remote Education Policy aims to:

- ensure consistency in the approach to remote learning for all pupils (inc. SEND) through the use of quality online and offline resources and teaching videos;
- provide clear expectations to members of the school community with regards to the delivery of high quality interactive remote learning;
- include continuous delivery of the school curriculum, as well as support for motivation, health and wellbeing;
- consider continued education for staff and parents (e.g. CPD, supervision and parent consultations);
- support effective communication between the school and families and support attendance.

3 .Who is this policy applicable to?

- A child *(and their siblings if they also attend Copthill School)* is absent because they are awaiting test results and the household is required to self-isolate. The rest of their school bubble are attending school and being taught as normal.
- A child's whole bubble is not permitted to attend school because they, or another member of their bubble, have tested positive for Covid-19.

4. Content and Tools to Deliver This Remote Education Plan

Resources to deliver this Remote Education Policy might include:

- online tools:
    - Tapestry
    - Google Classroom
    - Google Meet and/or Zoom
    - SchoolCloud for formal parent consultations;
- use of recorded video through Screencastify or iMovie – for example, for instructional videos and assemblies;
- phone calls home;
- printed learning packs;
- physical materials such as reading books
- Use of ReadiWriter, Fiction Express, MyMaths

Instructional documents and videos, timetables and resources to deliver this policy are available via the Staff Hub.

5. Home and School Partnership

Copthill School is committed to working in close partnership with families and recognises each family is unique. Because of this, remote learning will look different for different families in order to suit their individual needs.

Copthill School will provide information for parents on how to use Tapestry and Google Classroom.

Where possible, it is beneficial for young people to maintain a regular and familiar routine. Copthill School would recommend that each 'school day' maintains structure.

We would encourage parents to support their children's work, including finding an appropriate place to work and, to the best of their ability, support pupils with work encouraging them to work with good levels of concentration.

Every effort will be made by staff to ensure that work is set promptly. Should accessing work be an issue, parents should contact school promptly and a solution will be sought. These will be discussed on a case-to-case basis.

Our children sign an 'Acceptable Use Policy' at school which includes online safety rules and this applies when children are working on computers at home.

6. Roles and responsibilities

Teachers
Responsibilities below relate to when a whole class/bubble is isolating and would be reduced when it is fewer children isolating and the majority of the class are in school.

Copthill School will provide a refresher training session and induction for new staff on how to use Tapestry/Google Classroom.

When providing remote learning, teachers would be expected to be available during normal school hours, although staff may make their own adjustments to this routine after discussion with their Department Lead. If they are unable to work for any reason for a significant portion of the school day, for example due to sickness or caring for a dependent, they should report this using the normal absence procedure.

Staff should not behave any differently towards pupils compared to when they are in school and should follow the same safeguarding principles as outlined in the ***Child Protection and Safeguarding Policy*** and ***Staff Code of Conduct*** when it comes to the relevant systems and behaviours.

When providing remote learning, teachers are responsible for:

- setting work:
    - Teachers will set work for the pupils in their classes.
    - The work set should follow the usual timetable for the class had they been in school, wherever possible
    - Weekly/daily work will be shared by 6pm on the previous evening
    - Teachers will be setting work on Google Classroom
- providing feedback on work as per our Feedback for Learning Policy
- keeping in touch with pupils who aren't in school and their parents:
    - If there is a concern around the level of engagement of a pupil/s, parents should be contacted via phone or email to decide whether school intervention can assist engagement.
    - Any complaints or concerns shared by parents or pupils should be reported to a member of SLT– for any safeguarding concerns, refer immediately to the DSL

Teaching Assistants
Teaching assistants must be available to support teaching staff or complete tasks as directed by a member of the SLT during normal school hours. Any changes to these normal hours, i.e. additional hours or adjustments to support teachers, should be discussed in advance with their Department Lead. If they are unable to work for any reason for a significant portion of the school day, for example due to sickness or caring for a dependent, they should report this using the normal absence procedure.

Staff should not behave any differently towards pupils compared to when they are in school and should follow the same safeguarding principles as outlined in the ***Child Protection and Safeguarding Policy*** and ***Staff Code of Conduct*** when it comes to the relevant systems and behaviours.

Senior Leaders
Alongside any teaching responsibilities, senior leaders are responsible for:

- ensuring that all relevant staff have been briefed and understand the policies and the standards of conduct expected of them;
- co-ordinating the remote learning approach across the school including clearly defined operating times and daily monitoring of engagement;
- monitoring the effectiveness of remote learning – such as through joining a range of lessons, regular meetings with teachers and subject leaders and feedback from pupils and parents;
- reviewing work set and acting on feedback from pupils and parents;
- monitoring the security of remote learning systems, including data protection and safeguarding considerations.

Designated Safeguarding Lead
The DSL is responsible for managing and dealing with all safeguarding concerns. For further information, please see the Safeguarding and Child Protection Policy.

Bursar
The Bursar is responsible for:

- assisting pupils and parents with accessing the internet or devices;
- fixing issues with systems used to set and collect work;
- helping staff with any technical issues they're experiencing;
- reviewing the security of remote learning systems and acting on any data protection breaches in his role as data protection officer.

SENCo
The SENCo is responsible for:

- liaising with the Headteacher and Bursar to ensure that the technology used for remote learning is accessible to all pupils and that reasonable adjustments are made where required;
- ensuring that pupils with EHC plans continue to have their needs met while learning remotely, and liaising with the Headteacher and other organisations to make any alternate arrangements for pupils with EHC plans;
- identifying the level of support needed for children referred to her department.

Pupils and Parents
Staff can expect pupils (with the support of parents) learning remotely to:

- complete work to the deadline set by teachers;
- seek help if they need it;
- alert teachers if they're not able to complete work.

Staff can expect parents with children learning remotely to:

- make the school aware if their child is sick or otherwise can't complete work;
- seek help from the school if they need it;
- be respectful when raising any concerns or complaints to staff.

Appendix 1
Extract from *Guidance for Safer Working Practice for Those Working With Children and Young People in Education Settings*

Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents.

The following points should be considered:

- think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be nondescript
- staff and pupils should be in living / communal areas – no bedrooms
- staff and pupils should be appropriately dressed
- filters at a child's home may be set at a threshold which is different to the school
- resources / videos must be age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content

It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and / or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration should be given to data protection issues; e.g., whether parental / pupil consent is needed and retention/storage. If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately. Staff, parent and pupil AUPs should clearly state the standards of conduct required.