

NEWPORT GIRLS' HIGH SCHOOL ACADEMY TRUST



CHILD PROTECTION & SAFEGUARDING POLICY

Policy written by:	Miss H Clarke
Policy written/reviewed:	September 2019
Next review due:	September 2020
Statutory Governor Approval:	22 January 2019

Legislation and Statutory Guidance

“Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

Various other statutory duties apply to other specific organisations working with children and families and are set out in this chapter”

Guidance to inform this policy has been taken from Department for Education’s statutory guidance “[Working together to safeguard children](#)” 2018, “[Individual organisational responsibilities](#)”, Furthermore page 55 relates to “Individual organisational responsibilities” and duties of “Schools and colleges” within the Section of 175 and 157 of the Education Act 2002 and “[Keeping Children Safe in Education](#)” September 2019.

Aims

- The aim of the school policy is to make all within the school feel safe and have clear roles and responsibilities in place for that to happen. This policy replaces the previous policy of 1st September 2018.
- The school’s duty of care will be in line with Government Legislation and [Local Telford & Wrekin Safeguarding Partnership \(TWSP\) Procedures](#).
- The safety and protection of all children is of paramount importance to all those involved in Education. For avoidance of doubt the role of governing bodies of all schools and colleges is set out in KCSIE, effective from 2nd September 2019. This guidance coupled with Working Together to Safeguard Children, is the blueprint for all inter agency working and should be available and accessible to all those responsible for children’s welfare. The governing body will ensure that all staff have read at least part one of KCSIE. We will maintain a record of all those who have read part one of the KCSIE. The school recognises that best practice would be for all staff to be acquainted with all parts of KCSIE.
- All of the school community believe that our school should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child. As a school we will follow the Department for Education advice [What to do if you’re worried a child is being abused](#).

Part One: Safeguarding information

Primary responsibility for the care and protection of children rests with parents, but a range of services is available to help them in this task.

At Newport Girls’ High School, it is everyone’s responsibility to safeguard and promote the welfare of children, this includes everyone who comes into contact with children and their families. Everyone should consider, at all times, what is in the best interest for the child.

For the purpose of this policy safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
 - preventing impairment of children’s health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

No one in the school will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action.

Children can develop a special and close relationship with the school community and view them as significant and trustworthy adults. For the purpose of this policy and for avoidance of doubt, the school community, includes, parents, children and all those that work or volunteer at the education setting.

Parents need to be in no doubt that this policy is our commitment towards the statement above and we expect that they embrace everything that is documented in our policy. In principle parents sign up to our school ethos, the law and the legislation that sits behind it.

Newport Girls' High School is committed to identifying children who may benefit from early help as soon as a problem emerges.

At our school staff maintain the attitude 'it could happen here' where safeguarding is concerned. Staff must always act in children's interest where they are concerned about a child's welfare.

At Newport Girls' High School we agree that the safety, welfare and protection of all children is paramount and any delay in reporting concerns is unacceptable. All staff will adhere to this principle and the child protection procedures established by the TWSP and the underlying principles that lie within it.

Our policy will be published on our school/college website for all to view.

The designated safeguarding lead (DSL) for school/college is: Miss H Clarke

Their deputies are: Mr M J Scott, Mrs F Davenport and Mrs K Danby

The governor with responsibility for safeguarding is: Mrs J Macpherson

The designated safeguarding lead and their deputies role is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

All staff (paid or voluntary) will receive a robust induction to help them fully understand the systems for safeguarding, in addition to this policy staff will be familiar with our school rewards and behaviour policy, staff code of conduct, how to respond to children going missing and the role of the DSL. They will receive appropriate child protection and safeguarding training for their role.

At NGHS staff will never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

Early help

Newport Girls' High School believe that any child may benefit from early help and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- 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 drugs or alcohol themselves;
- has returned home to their family from care; and,
- is a privately fostered child.

Abuse and neglect

At NGHS all staff are trained on the indicators of abuse and neglect to help them identify children who may be in need of help or protection. We believe that abuse, neglect and safeguarding issues are rarely stand-alone events.

Indicators of abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known

to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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.

The fabrication or induction of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information'. NGHS will adopt the guidance [Safeguarding children in whom illness is fabricated or induced](#).

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

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

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.

Safeguarding issues

At NGHS all staff are trained on safeguarding issues that can put children at risk of harm.

Peer on peer abuse

At NGHS all staff are trained to understand that children can abuse other children we refer to this as peer on peer abuse. All staff will be made aware of the wider safeguarding issues children may face. All staff will be trained in how to escalate any of the concerns appropriately.

Children and the court system

NGHS recognises that sometimes children are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will follow the age appropriate guides to support children [5-11 year-olds](#) and [12-17 year-olds](#).

NGHS will follow these guides to ensure the correct process is followed and support and special measures are made available.

We understand that when child arrangements via the family courts are made following separation this can be a stressful and entrenched conflict in families and can be stressful for children. We will follow the [guidance of the Ministry of Justice](#) in managing these situations.

Children missing from education

Where children have gone missing we will follow the [Local Missing Children Process](#).

At NGHS staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and 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. We will use early help strategies if necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Children with family members in prison

At NGHS we recognise that children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use the information from [NICCO](#), to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE)

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

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

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

If we feel that children may be being abused through exploitation we will consult in the normal way with the multi-agency safeguarding hub Family Connect and seek advice as to whether the incident follows a [CSE Care Support Pathway](#). The concerns will be followed through sensitively and appropriately with fellow professionals and the [CATE](#)

[Referral Form](#) will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around a child attending our school, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this we have taken the same steps and made all staff aware of the TWSP [CSE Warning Signs Checklist](#). Due to the high number of reports in our borough, we will be particularly alert to the CSE.

Child criminal exploitation: county lines

At NGHS we recognise that we and the vast majority of young people will not be affected by serious violence or gangs. However, if these problems do occur there will almost certainly be a significant impact.

We will embrace the Home Office guidance for [Preventing youth violence and gang involvement practical advice for schools and colleges](#) and follow this guidance which clearly sets out understanding the issue, seeking support, working with local partners, early help and legal powers for our staff. NGHS has a duty and a responsibility to protect our students and staff and we recognise dealing with violence also helps attainment.

NGHS recognises criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, 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. We recognise that the key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Should we suspect this we will refer to the multi-agency safeguarding hub Family Connect and to the [National Referral Mechanism](#).

In respect of the above we will ensure staff and students must:

- feel safe at our setting all the time;
- understand very clearly what safe situations are;
- be highly aware of how to keep themselves and others safe;
- monitor thoroughly missing episodes;
- aware that any child of any age and gender may be vulnerable to grooming activity by others of any age and gender;
- aware a child of any age may be susceptible;
- aware that it is exploitation even if consensual; and,
- aware that it may be typified by a form of power imbalance.

We recognise that child criminal exploitation can take a number of forms.

Modern slavery and child human trafficking

NGHS recognise modern slavery, including child trafficking as abuse. If we become aware or have suspicions that a child may have or is being exploited or trafficked, we will contact Family Connect in the normal manner to seek advice and support. All children, irrespective of their immigration status, are entitled to safeguarding and protection under the law. We recognise this as any normal child protection referral and potential victims of trafficking and modern slavery can be of any nationality and may include British children.

Domestic abuse

NGHS recognises domestic violence and abuse as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

We understand exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

NGHS will always liaise with agencies in a two-way process where domestic abuse and/or violence is a factor in a household. Children within our care will be supported where needed. We are part of the Operation ENCOMPASS process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and impact on children's development.

Homelessness

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

NGHS staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis.

We recognise in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. In these cases will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the [provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation](#).

So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

NGHS recognise that so-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices, such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. NGHS sees all forms of HBV as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure the school community are alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate the local safeguarding procedures by contacting Family Connect and if necessary the police. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

FGM

NGHS understand that FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

As a school/college we will follow the National FGM Centre [Female Genital Mutilation: Guidance for schools](#).

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same

definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with our designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow our local safeguarding procedures and report to Family Connect.

In respect of FGM we will adopt the local [TWSP FGM Practice Guidelines and Resource Pack](#) as part of safeguarding responsibilities and inform/educate our staff in this particular area.

Forced marriage

NGHS understand that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. We play an important role in safeguarding children from forced marriage.

We will follow the [Forced Marriage guidance](#). Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk

Preventing radicalisation

As a school we understand children are vulnerable to extremist ideology and radicalisation. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

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

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

We accept that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

NGHS understand it is where possible our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training staff will be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which must include reporting their concerns to the designated safeguarding lead (or deputy) who will consider making a referral to the Channel programme.

The Prevent duty

NGHS is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

We see The Prevent duty as part of our wider safeguarding obligation. All of designated safeguarding leads and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76.

We will follow the published advice for schools on the [Prevent duty](#). We aim to ensure all staff have completed the Workshop to Raise Awareness of Prevent.

Channel

NGHS recognise Channel as a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so.

At NGHS we have procedures in place to monitor IT usage and have a duty to seek advice and explore by filtering suspicious content being viewed. Those within and outside the school community should be left in no doubt of our duty to cooperate with the law.

If we feel children are being abused through extremism or being radicalised, we will consult directly with Family Connect and the police PREVENT team and seek advice. This is done with a [PREVENT referral form](#) (please see [the flowchart](#)). The PREVENT referral will be sent to Family Connect and the police. As with all referrals this referral will be dealt with appropriately with professionals. If it is deemed from the PREVENT team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with the professional lead for Telford & Wrekin Council. Presently this being **Jas Bedesha**. Our policy also recognises that the local police can be contacted in imminent circumstances on 01386 591835/591825 or 591816 and at prevent@warwickshireandwestmercia.pnn.police.uk.

Sexual violence and sexual harassment between children

NGHS understands that sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

We recognise that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. We will ensure that **all** victims are taken seriously and offered appropriate support. Staff are aware that some groups are potentially more at risk. We know that evidence shows girls, children with SEND and LGBT children are at greater risk.

NGHS will ensure that staff are aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003/105 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

NGHS believe that consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats; and
 - upskirting.

Upskirting

NGHS understands that '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. We accept that this is now a criminal offence.

The response to a report of sexual violence or sexual harassment

We will always reassure victims that they are being taken seriously and that they will be supported and kept safe. We will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, as is always the case, they should speak to the designated safeguarding lead (or a deputy). They will then consider the options to manage the concern, including:

1. manage internally;
2. early help;
3. referral to children's social care; and
4. reporting to the police.

NGHS will adopt [Sexual violence and sexual harassment between children in schools and colleges: advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads.](#)

Where necessary for effective safeguarding we will utilise/seek resources and seek support from established sources. We will consider and in some cases access the toolkit [Peer-on-peer abuse toolkit](#) to assist in our decision making and will also consider the [Brook traffic light tool](#). For an initial scoping we may consider the [TWSP Sexually harmful behaviour - risk assessment tool](#). We will, as necessary, seek advice on harmful sexual behaviours from the specialist sexual violence sector for a whole school approach. We will consult in the first instance with Family Connect for advice and support and seek advice around how best to deal with any issues.

In relation to sexting, also known as youth produced sexual imagery, this school will where necessary consult with guidance produced by [The UK Council for Child Internet Safety \(UKCCIS\) Education Group Sexting in Schools and Colleges](#) and Department for Education guidance [Searching, screening and confiscation](#). The Designated Safeguarding Lead (or Deputy) will take the lead on these issues.

Contextual safeguarding

NGHS recognises that incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially our designated safeguarding lead (and deputies) will consider the context within which such incidents and/or behaviours occur. We refer to this 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.

What to do if you have concerns about a child

Where someone has a concern about the welfare of children, wherever possible, there should be a conversation with the designated safeguarding lead (or deputies), who will help staff to decide what to do next. Options include;

- managing any support for the child internally via the schools own pastoral processes;
- an early help assessment;
- a referral for statutory services, for example, as the child is in need or suffering or likely to suffer significant harm. This will involve contacting Family Connect.

All referrals to Family Connect must be followed up in writing by completing a [request for service form](#) within 24 hours.

Referral agencies

Telford & Wrekin	Shropshire	Staffordshire
Family Connect 01952 385385 Out of Hours 01952 676500	First Point of Contact 0345 678 9021 Out of Hours 0345 6789040	First Response 0800 1313 126 Out of Hours 0345 604 2886 or 07815 492613
If you think a child is in immediate danger, call the emergency services on 999		
Childline 0800 1111	NSPCC 0800 800 5000	Protecting Vulnerable People (West Mercia Police): 0300 333 3000

Immediate response to a child or parent

It is vital that our actions do not put a child at further risk of harm or prejudice an investigation, for example:

- listen to the child or parent, if you are shocked by what is being said, try not to show it,
- it is okay to observe injuries or bruises but not to ask a child or parent to remove their clothing to observe them,
- if a disclosure is made, the pace should be dictated by the child or parent, without the them being pressed for detail or by asking leading questions such as ‘what did he/she do next?’ or ‘where did he/she touch you?’. It is our role to listen not to investigate;
- we will use open questions, such as the ‘TED’ model of questioning; ‘tell’; ‘explain’ and ‘describe’,
- we will accept what the child or parent says. We will be careful not to burden them with guilt by asking ‘why didn’t you tell me before?’ or ‘why did you let it happen?’;

- we will acknowledge how hard it was for them to disclose and reassure them that they have done the right thing by telling someone;
- we will never criticise the alleged perpetrator, the child or parent may have warm feelings for them, but merely wish any abuse to stop;
- we will not promise confidentiality, staff will explain who they have to tell, such as the designated safeguarding lead (or deputies) and why; and, depending on the child's age, what the next stage will be. It is important that you don't make promises that you cannot keep such as 'I'll stay with you all the time' or 'it will be all right now'; and,
- if staff are not able to understand the communication method or language used by the child or parent they should seek support from an appropriate person to support them in receiving the disclosure.

If a child confides in a member of staff and requests that the information is kept secret, staff will tell the child sensitively that they have a responsibility to refer cases of alleged abuse to the appropriate agencies for the welfare of that child. Within that context, the child should, however, be reassured that this will be shared on a 'need to know' basis. If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

In exceptional circumstances where the designated safeguarding leads (or deputies) is not available, this should not delay appropriate action being taken. Any action taken should be shared with the designated safeguarding lead (or deputies) as soon as is reasonably practicable. Staff must never assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

We will never allow fears about sharing information to stand in the way of the need to promote the welfare, and protect the safety of children. We expect concerns that arise in a morning will be reported to the designated safeguarding leads (or deputies) by lunchtime that day. Concerns that arise in an afternoon should be reported by or as close to the end of the school day. Any concerns arising outside of the normal school day should be reported as quickly as possible. If in doubt concerned parties should talk with the designated safeguarding lead (or deputy). In the unlikely event of the designated safeguarding lead (or deputy) being unavailable, concerns for children's welfare must be reported to Family Connect. **Delay is unacceptable.**

Where safeguarding concerns are raised during an educational visit the designated safeguarding lead (or deputy) must be notified without delay, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

Where there are visible injuries all staff should record these on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

For staff to interpret any concerns this school will assess each incident as it appears. In respect of assessing any bruising to a child this school will refer to the [Bruising of Children guidance produced by the TWSP](#) to assist their decision making.

We will work appropriately with each child, their family and other agencies to protect in all cases the welfare of the child. We will work in partnership and fulfil the ethos and abide by the principles of the [Telford and Wrekin threshold guidance](#). All school staff must be prepared to identify children who may benefit from early help. For avoidance of doubt, early help means this school will provide support as soon as a problem emerges at any point in a child's life from the foundation years up to adulthood.

Staff within this school may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Staff within this school will also be made aware of the process for making referrals to children's social care (Family Connect) and statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be

expected to play in such assessments. Also, staff will be made aware of the flowchart from KCSIE 2019 page 16 'Actions where there are concerns about a child'.

The school role is to refer with the information received and **under no circumstances** become the investigator.

Confidentiality

The personal information about all families is regarded by those who work in this school as confidential. All staff are aware of the confidential nature of personal information and will aim to maintain this confidentiality in all areas of the school.

Staff understand they need know only enough to prepare them to act with sensitivity to a child and to refer concerns appropriately. It is inappropriate to provide all staff with detailed information about the child, the incident, the family and the consequent actions.

The role of the local authority

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to NGHS as the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need, and should be assessed under section 17 of the Children Act 1989
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- any services are required by the child and family and what type of services
- further specialist assessments are required to help the local authority to decide what further action to take
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

The referrer will, even if they are not the designated safeguarding lead (or deputy), follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, NGHS will consider following [local escalation procedures](#) to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

Anyone who has a child protection concern or who has received a disclosure should follow these recording principles:

- make some brief handwritten notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, recording facts, who you shared them with and not assumption, supposition and interpretation;
- record where you spoke with the child or parent and personal safety details, such as 'I discussed the incident with the child in the head teacher's office with the door open' or justify if it were closed, but naming those who you told this to be the case. If alone, reason that rationale stating 'the child stated they would only confide in me if I was alone';
- if it is observation of bruising or an injury try to record detail, e.g. 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg';
- note the non-verbal behaviour and the key words in the language used by the child or parent (try not to translate into 'proper terms' ensuring that you use the child or parent's own words). Body language should be noted and support any record of disclosure; and,
- it is important to retain on file signed original handwritten notes and pass them on to the designated safeguarding lead (or deputy) who may ask you to complete a Family Connect Request for Service Form.

Our policy for record keeping is to chronologically record concerns in a confidential file, including details of dates, times, staff involved and action taken. These should be handwritten but can be typed up to sit alongside handwritten notes. Never discard handwritten notes.

Copies of email streams are also useful additions which can clearly document sequential action. Again, these should be used alongside handwritten notes and by no means be regarded as a substitute action. It is preferable not to name children or parents in an email, but if they are, then it should be password protected.

We have adopted guidance from TWSP [Workbook Guidelines for Child Protection Records, Transfer, Retention & Archiving](#) keep our systems robust with the current advice.

This school has adopted an electronically maintained recording system called Child Protection Online Management System (CPOMS). The CPOMS system is a totally secure system of record keeping which enables us to quickly encapsulate a child journey with us. We will ensure that a restricted number of staff will have full access to this system as named key holders. If concerns have been logged by staff via this process it should not be presumed that this is an instant notification that has been seen immediately. If appropriate the issue should not assume anything and a verbal conversation should also take place if needed for clarification.

All child protection records are reviewed annually in the summer term by the designated safeguarding lead (or deputy) and checked to be chronological, tidy, legible and factual in content. This should be undertaken each year, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings these should include attendance figures where the child is of compulsory school age.

All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMS, the nominated persons are responsible, accountable, documented and are identifiable within our school for total security at the setting. Also, procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Withdrawal of child protection records from the school by staff will be noted and signed for, as will files released to professionals. We will follow the Workbook Guidelines guidance on release and return.

No named statistics in relation to child protection are an important part of performance information. Since 1st September 2017 each designated safeguarding lead and governor with responsibility for safeguarding has access to a section 175/157 workbook. This information can be collated in the workbooks and will inform the head teacher and the governing body of how our school is managing child protection issues. These will be entered and updated on a regular basis either in the workbook or within the CPOMS process.

Retention of children's files

All school must keep educational records on their children. These should include:

- copies of the reports which have been sent to parents/carers on the children's achievements, as well as other records about those achievements;
- exchanges of correspondence between parents/carers and the school;
- any information the school has on the child's education from the local authority;
- any Education Health Care Plan or less commonly statement of special educational needs; and
- any personal educational plan.

There may be other records kept, like details of attendance, exclusions, behaviour and family background. This is not compulsory but would be viewed as 'best practice'. The educational record does not include the notes that a teacher makes for his or her own use only.

The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidently. We will refer to the [Data Protection: toolkit for schools](#).

What to do if you are concerned about another safeguarding practices in the school/college

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

As an academy any concerns should be raised in accordance with our Whistleblowing policy.

Where staff feel that they cannot report a concern through the above channels general guidance can be found at [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk

Part two: The management of safeguarding

The **designated governor** with responsibility for safeguarding is Mrs J Macpherson. They have access to a workbook of their roles and responsibilities which will ensure the completion of the safeguarding section 175/157 audit, on a yearly basis. These will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

NGHS' governing body are committed to working together to create and maintain a safe learning environment for the children and young people attending this setting. We will follow the specific guidance as set out in paragraphs [Working Together to Safeguard Children 2018](#) and [Keeping Children Safe in Education 2019](#) and will ensure that the procedures set in the policy are implemented to help ensure appropriate safeguarding responses, including:

- a staff and code of conduct;
- children who go missing from education;
- child protection and safeguarding;
- suicide intervention;
- bullying, harassment and discrimination;
- use of reasonable force and restraint and behaviour management;
- health and safety including use of equipment and provision of first aid;
- use of the internet, electronic devices and social networking sites;
- school trips, placements, outdoor activities;
- extended services provision;
- drugs and substance misuse;
- meeting the needs of pupils with special medical conditions;
- meeting the need of pupils in disseminating prescribed medications;
- intimate care;
- school security;
- whistleblowing policy; and,
- issues which may be specific to our local area or population, for example serious violence and child sexual exploitation.

All staff and governor meetings will have child protection and safeguarding as an agenda item on them; this is testament to our school making these priority areas and at the forefront of our minds.

The school premises are safe and the grounds are not open to unwanted intruders.

We will ensure that suitable arrangements are in place to provide access for staff to access safeguarding supervision.

The Designated Safeguarding Lead (DSL)

NGHS' governing body has appointed Miss H Clarke to be the designated safeguarding lead of this school and Mr M J Scott, Mrs F Davenport and Mrs K Danby to be their deputies. We will set out these responsibilities in their job description and expect these people to take lead responsibility for safeguarding and child protection.

Miss H Clarke will take ultimate responsibility for safeguarding and child protection at school as the designated safeguarding lead.

During term time, the designated safeguarding lead and/or a deputy will always be available (during our normal school/college hours) for the staff to discuss any safeguarding concerns with.

During out of hours/out of term activities we will provide appropriate cover by ensuring the designated safeguarding lead and/or a deputy is available.

The designated safeguarding lead and any deputies will undergo two-day 'newly appointed designated safeguarding lead' training as recognised by TWSP to provide them with the knowledge and skills required to carry out the role. They will attend one day designated safeguard lead refresher training as recognised by TWSP every two years. In

addition to their formal training as set out above, their knowledge and skills will be updated, for example, via Telford & Wrekin Council's Education Safeguarding e-bulletin, attending termly designated safeguarding lead refreshers and taking time to read and digest safeguarding developments, at regular intervals, and at least annually, to keep up with any developments relevant to their role. We aim to ensure at least one designated safeguarding and any deputies attend each termly update. All designated safeguarding leads and any deputies will disseminate training to all relevant staff and governors.

Staff

All staff, including supply teachers, visiting professionals working with children in the school (e.g. counsellors), those who support sex education (e.g. school nurse), external providers of school activities and those supporting school visits, are informed of the name of the designated safeguarding lead and deputies and the schools' procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures.

Staff should not accept personal invitation visits to the homes of children unless permission or instruction has been sought from the head teacher and it is viewed as a professional appointment, for example, supporting education welfare issues etc. This should be viewed on a case by case basis. To support this, guidance from the Department of Education (September 2010) states 'Meetings with pupils away from the school premises should only be arranged with the specified approval of the head teacher and the prior permission of the pupil in question'. We accept this guidance from the Department of Education (September 2010) stating that in the case of private meetings; 'Staff and volunteers should be aware that private meetings with individual pupils could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another pupil or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place'.

Multi-agency working

The school's governing body and the designated safeguarding lead are familiar with the TWSP arrangements. They will engage with the TWSP as required. They will follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the child resides to follow the local protocol for assessments. The governing body of NGHS expect the staff to work with social care, the police, health service and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will always contribute to inter-agency plans to provide additional support to children subject to child protection plans. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

Information sharing

NGHS recognise that information is vital in identifying and tackling all forms of abuse and neglect. The governing body expect all staff to share information with practitioners and local agencies. In respect of files being released when requested by the Police under [Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6\(1\)d'](#) should accompany that release and a copy will be retained for our records. Also we will consider the [7 Golden Rules for Information Sharing](#). This school will also seek advice and adopt the [Information sharing advice for safeguarding practitioners](#). If in any doubt we will seek advice from our **Data Protection Officer**. Upon releasing records the school will request ID Badges for release. If the Police are only after minimal data e.g. address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A form may not be required on these occasions.

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

When a child changes school within or outside the authority, all child protection records will be passed or securely sent on to the DSL of the next educational setting by the current designated safeguarding lead or head teacher. The designated safeguarding lead, if thought appropriate, may wish to share relevant safeguarding information in

advance of new children arriving if they need continuing support e.g. in response to sexual abuse. If the child is transferring/leaving to attend another school within term time, best practice would be for a signed record/or hard copy acknowledgement that the transfer of files has taken place. The current host school in this process should **not** photocopy and retain child protection records as this is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018 (DPA 18), but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes, this would be deemed as best practice. We will follow the Workbook Guidance in all circumstances.

Training

The governing body will ensure that all staff undergo safeguarding and child protection training, including online safety at induction. We will update staff training regularly. We will train staff on the TWSP policies and procedures, our child protection and safeguarding policy, the schools behaviour policy and code of conduct and ensure they access face-to-face raising awareness of child protection training. All staff will receive training in managing sexual violence and sexual harassment.

All staff will receive regular safeguarding and child protection and updates as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children.

Parents

Parents play an important role in protecting their children from abuse. NGHS is required to consider the safety of the child and should a concern arise, professional advice will be sought prior to contacting parents. If deemed appropriate parents will be contacted, and the school will continue to work with them to support the needs of their child. Consent from the parents will be sought, although in exceptional circumstances and with the best interests of the child being considered, this may be overridden.

NGHS aims to help parents understand their responsibility for the welfare of all children, which includes their duty to refer cases to social care services and/or police in the interests of the child. The governing body will include a child protection statement in the school prospectus and all parents can view a copy of this policy.

Parents that have concerns regarding a member of staff can in the first instance raise those with the head teacher, designated safeguarding lead or the governing body of the school. This may involve sharing those concerns with the relevant agencies. Where the parent has concerns regarding the head teacher, the chair of governors should be consulted in the first instance.

On occasions Ofsted may forward complaints that may raise a safeguarding concern about our school via Family Connect. In such instances we will work with all agencies within Family Connect to clearly respond to Ofsted on a case by case basis.

Parents/Carers can also access Ofsted [Parent View](#) which is an online survey questionnaire where parents can give their views. Where possible this will be monitored regularly by the school to quickly address any concerns.

All complaints should be made via our school/college complaints procedures.

We will keep parents informed of all areas of safeguarding and child protection through the regular methods of communication.

NGHS wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely from us. If a parent's behaviour is a cause for concern, then we will ask them to leave the school premises. We wish to make it clear that in serious cases, the headteacher can/will notify parents in writing that their implied licence to be on the school premises is temporarily revoked, subject to any representations that the parent may wish to make. This school will give parents the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

Schools are private places. We will therefore act to ensure they remain a safe place for all. The public has no automatic right of entry.

NGHS expect parents to talk to us about any concerns they have about care and education provided by us in the first instance. We urge all parents not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation; technology often provides the platform that facilitates harm. An effective approach to online safety empowers NGHS to protect and educate the whole school community in our use of technology and we will work with our information technology partners to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable:

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

NGHS will teach safeguarding, including online safety. We will use the [Teaching online safety in school](#) guidance to ensure our pupils understand how to stay safe and behave online as part of our curriculum.

NGHS has policies regarding Online Safety and staff and students sign an acceptable ICT usage policy

Our information technology (IT) services provider use monitoring software in our school and will be reviewed, updated and checked regularly. This addresses and includes all online risk of harm, including risks posed by the online activity of extremist and terrorist groups. On occasions, unacceptable websites might be accessed inadvertently; if this occurs then this should be closed down immediately and logged and reported to either the head teacher, designated safeguarding lead and to the IT services technician.

NGHS recognises that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular. We will manage this by:

- teaching children about online safety;
- not allowing children to use personal electronic devices in school/college;
- not allowing children to take images of other children or staff; and,
- only allowing children to access their personal electronic devices off the school premises.

We recognise at this school that all information technology, whether personal or work based, is a whole school issue and all staff have a duty to be vigilant.

NGHS recognises online safety is a major concern for all professionals. For information and support staff will refer to the 'information and support' section of Annex C: Online safety KCSIE.

NGHS takes seriously its duties to assist parents and help them with on line safeguarding resources. As such, we will make them aware of the webpage Parent Info which is a comprehensive, free resource for schools and parents covering a range of safeguarding topics and information about apps and when they are updated etc. The content can be found at <http://parentinfo.org/>

Safe use of electronic devices

NGHS will follow the good practice guidance from the Information Commissioners Office, on [taking photographs in educational institutions](#). In the interests of safeguarding a common-sense approach on a case by case basis will be taken in this area.

Under **no** circumstances will staff photograph injuries seen on children. NGHS staff are not expert witnesses. If the concern is around non-accidental injury then that is a matter that requires immediate attention on the day resulting

in an appropriate referral to Family Connect. Those professionals will control the process of photographic evidence gathering underway and assessment.

Teaching safeguarding

NGHS will teach children about safeguarding, including online safety. We will do so as part of our curriculum and cover all relevant issues through:

- Relationships and Sex Education;
- Personal, Social, Health and Economic education; and,
- Health Education (state-funded schools).

Inspection

NGHS recognises its responsibilities for safeguarding within the remit of Ofsted.

Safer recruitment

The governing body is committed to preventing people who pose a risk of harm from working with children. We will adhere to all statutory responsibilities to check staff who work with children. We will ensure volunteers are appropriately supervised.

The governing body ensures that at least one of the persons who conducts an interview has completed safer recruitment training. These persons will complete appropriate Safer Recruitment training

The following persons have completed safer recruitment training for this school:

Mr M J Scott

Children's wishes

The governing body and leaders of NGHS, will ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. The head teacher and designated safeguarding lead will put systems in place to for children to express their views and give feedback. We will always operate with the best interests of the child at heart.

Looked after children and previously looked after children

NGHS recognises that the most common reason for children becoming looked after is as a result of abuse and/or neglect. All staff at our school have the knowledge and skills to keep looked after children safe. The designated safeguarding lead will hold the details of each child's social worker and the name of the virtual school head in the authority that looks after the child. They are responsible for ensuring all staff have the information they need in relations to a child's looked after status and the child's contact arrangements with birth parents of those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegate to the carer by the authority looking after him/her.

NGHS recognises a previously looked after child potentially remains vulnerable.

When dealing with looked after children and previously looked after children we will work with all agencies to take prompt action where necessary to safeguard these children.

The designated teacher

As an academy we have a trained teacher who takes the lead for looked after children. This is Miss H Clarke. NGHS will follow the statutory guidance on [The Roles and Responsibilities of the Designated Teacher](#).

Virtual school heads

Virtual school heads manage pupil premium plus for looked after children. They receive this funding based on the latest published number of children looked after by the local authority. As an academy we have an appropriately trained teacher who will take the lead in working with the virtual school head. The teacher will work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The teacher should also work with the virtual school head to promote the educational achievement of previously looked after children. We will follow the statutory guidance on [Promoting the Education of Looked After Children](#).

Care leavers

The designated safeguarding lead understands the ongoing responsibilities of local authorities to the young people who cease to be looked after and become care leavers. The designated safeguarding lead will hold detail of the local authority Personal Advisor appointed to guide and support the care leaver, and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

Children who have special educational needs and/or disabilities (SEND)

NGHS recognises that children who have SEND can face additional safeguarding challenges. We accept the additional barriers that can exist when recognising abuse and neglect of children in the group. These can include:

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

To help address these additional challenges NGHS will provide extra pastoral support for children with SEN and disabilities.

The use of 'reasonable force'

There are circumstances when it is appropriate for staff in NGHS to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means us 'using no more than is needed'. Our use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

We will always follow the advice for schools on the Use of [Reasonable Force in Schools](#).

NGHS believe that the adoption of a 'no contact' policy at our school could leave staff unable to fully support and protect our pupils and students. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether to or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

NGHS will plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed.

Poor or irregular attendance

NGHS recognised figure for persistence absence is being less than **90%**, although concerns may still be raised if above this. We will comply with the statutory guidance [Children Missing Education](#).

In respect of this and at a local Telford & Wrekin Council level, we will require the behaviour and attendance lead to refer to use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying pupils who are missing out on education and policies and procedures for pupils on a modified timetable (available from Telford & Wrekin Council Access & Inclusion Team).

In addition to the above and where reasonably possible school will endeavour to hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional

options to contact a responsible adult when a child is missing education and poses a potential welfare/safeguarding concern.

Where a child is on a Child Protection Plan has been missing from school for two consecutive days we will notify the child's allocated social worker.

Children leaving school without permission

Where children leave the classroom or leave school grounds without permission, this is covered within our behaviour management policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a child without parental responsibility may do what is "reasonable" in all the circumstances to safeguard and promote the child's welfare. It is likely to be "reasonable" to inform the police, or children's services departments, and, if appropriate, their parents, of the child/young person's safety and whereabouts'.

However, in principle, if a pupil runs out of class we will establish where he or she has gone. For avoidance of doubt and for all within and outside of the school, staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any child who has taken themselves out of the school building and possibly out of the school grounds, unless this watchful eye provokes the child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the school premises, we will contact parents in the first instance. If they are not contactable we will inform the police that a pupil has left school and is at risk.

Drug and Substance misuse

Where issues come to our attention in relation to drugs and substance misuse we will follow the non-statutory advice contained within [DfE and ACPO drug advice for schools](#). This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within our school. The document clearly sets out our powers and what we can do. Coupled with this preventative and supportive approach this will sit hand in hand with our statutory functions of child protection and the alerting to established referral procedures and the law

Suicide Intervention

NGHS accepts and understands that thoughts of suicide are common and the leading cause of death in young people. As such suicide intervention is our business too. We to work with our pupils and work in partnership to support anyone in our school community that may have thoughts of suicide. This school will follow the local authorities [Suicide Intervention Policy](#) to assist wherever we can in making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject <http://zerosuicidealliance.com/>

NGHS recognises that suicide bereavement has been described as 'grief with the volume turned up'. The effects on families, communities and society as a whole are devastating and tragic. We will support in any way we can and the link below will be signposted as appropriate http://www.petesdragons.org.uk/Bereavement_Support_2369.aspx.

Changing in school

NGHS considers arrangements for safe changing of children for physical education (PE). We will be guided by the NSPCC guidance Best Practice for PE Changing Rooms. This consideration will come under our duty and remit of health & safety and in the context of children's welfare. We follow the guidance and do what we need to do as a school in relation to organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations for drama productions and using off-site changing rooms. [NSPCC factsheet](#)

Part three: Safer Recruitment

NGHS is committed to creating a culture of safe recruitment and, as part of this, we will adopt recruitments procedures that help deter, reject or identify people who might abuse children. The governing body will act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence, including criminal record checks (Disclosure and Barring Service (DBS) checks, barred list checks and prohibition checks, together with references and interview information.

NGHS have a system for the management of safer recruitment procedures, including for the following:

- recruitment, selection and pre-employment vetting;
- Disclosure and Barring Service (DBS) checks;
- prohibitions, directions, sanctions and restrictions;
- pre-appointment checks;
- employment history and references;
- single central record;
- individuals who have lived or worked outside the UK;
- agency and third-party staff (supply staff);
- trainee/student teachers;
- existing staff;
- volunteers;
- contractors;
- visitors;
- alternative provision; and
- adults who supervise children on work experience.

NGHS will maintain a single central record of pre-appointment checks. NGHS will meet all requirements as set out in Part three: Safer recruitment KCISE.

Visitors

NGHS understand we do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates for visitors. We will always request to see appropriate identification for visitors. The head teacher will use their professional judgement to determine the need to escort or supervise visitors. A record of visitors will be made and all they will be suitably identified/badged using the school lanyard system.

Alternative provision

For any children placed in external alternative provision provider, NGHS continues to be responsible for the safeguarding of that pupil, and we will satisfy that the provider meets the needs of the pupil. We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

Children staying with host families (homestay)

If NGHS arrange a homestay, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

We will always consider what intelligence/information will best inform our assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. We will use our professional judgement to decide what will be relevant. To help inform our assessment, we will obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow us to consider, alongside all other intelligence that we have obtained, whether the adults would be a suitable host for a child. We will also decide whether it is necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Homestay – suitability of adults in host families abroad

NGHS recognises it is not possible for us to obtain criminality information from the DBS about adults who provide homestays abroad. We will liaise with partner schools abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit. We will use our professional judgement to satisfy ourselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. We will always inform parents of the agreed arrangement.

We will decide on a case by cases whether it is necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

Private fostering

NGHS recognise that a private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or under the age of 18 if the child is disabled, this extends to children who are within homestay arrangements. Children who are looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered. Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases where so called "sofa surfing" has been evident.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's social care as soon as possible. If we become aware of a private fostering arrangement for a student that has not been notified to children's social care, we will encourage parents and private foster carers to notify them and will share information with children's social care as appropriate.

Part four: Allegations of abuse made against teachers and other staff

The process of managing allegations against those who work with children can be viewed on <http://westmidlands.procedures.org.uk/> Section 1.14 'Allegations against Staff or Volunteers'.

NGHS has internal procedures and processes in place for dealing with allegations and will follow TWSP policy & procedure.

We will adhere to Part four: Allegations of abuse made against teachers and other staff KCSIE.

This school believes that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adapted by this setting for staff and governors.

[Guidance for safer working practice for those working with children and young people in educational settings](#) produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all those that work with children. We will make all those in the school community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

NGHS will liaise with our commissioned human resources team to provide support to staff going through a disciplinary and/or allegations process. This will support referrers, investigators and those affected in any such dealings and gravity.

NGHS will manage all cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. We will act on all if a teacher or member of staff (including volunteers) in our school has:

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

If we receive allegations against a teacher who is no longer teaching in our school or at all we will refer this to the police. Historical allegations of abuse will also be referred to the police.

NGHS has a duty of care to their employees. We will ensure anyone facing an allegation receives effective support and we will provide the employee with a named contact if they are suspended. We are committed to dealing with any allegation of abuse made against a teacher or other member of staff or volunteer very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Staff will be advised to seek support from their Professional Association or Trade Union if it is needed.

The designated officer for the local authority **Glenn Ashbrooke** will be informed of all allegations that come to our attention and appear to meet the criteria set out above so they can consult police and children's social care services as appropriate.

The head teacher or (where the head teacher is the subject of an allegation) the chair of governors will discuss the allegation immediately with the designated officer by contacting Family Connect. The case manager will provide or obtain relevant information as requested by the designated officer. In some situations, the case manager may consider it appropriate to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will, be recorded by the case manager. The case manager will reach an agreement with the designated officer, on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation.

The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. The case manager will provide them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager will not do this until those agencies have been consulted, and have agreed what information can be disclosed to the accused. We will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. We will explore all options to avoid suspension prior to taking that step.

NGHS will consider options where an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case. We will discuss with the designated officer the next steps. In those circumstances, the options open to us depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension is not the default position: an individual should be suspended only if there is no reasonable alternative.

Where further enquiries are needed to enable a decision about how to proceed the case manager will discuss with designated officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by a senior member of the school's/college's staff.

The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. We will offer appropriate support from other services.

We will tell parents or carers of the child or children involved about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information considered in reaching a decision, will not normally be disclosed but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, we will advise them to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, we will work with children's social care services, or the police as appropriate, to consider what support the child or children involved may need.

The case manager will take advice from the designated officer, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

A referral to the DBS must be made, if the criteria are met. We will consider whether a referral to the Secretary of State is appropriate.

To avoid potential allegations and for the safety and welfare of pupils and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example, for the teaching of drama, in these cases the head teacher will make a judgement on a case by case basis being appropriate, balanced and proportionate.

Annex A: Roles of the designated safeguarding lead

The governing body has appointed Miss H Clarke as an appropriate senior member of staff, from the school leadership team, to the role of designated safeguarding lead.

The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety). We will make this explicit in the role holder's job description.

We give this person the authority they need to carry out the duties of their post. We give them time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

The designated safeguarding lead will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council Education Safeguarding Team.

They will complete the section 175/157 audit each year and submit to TWSP. The section 175/157 audit will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

Deputy designated safeguarding leads

NGHS have appointed Mr M J Scott, Mrs F Davenport and Mrs K Danby as the deputy designated safeguarding leads.

These deputies are trained to the same standard as the designated safeguarding lead and the role is explicit in their job description. Some of the activities of the designated safeguarding lead may be delegated to these appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility will not be delegated.

Manage referrals

The designated safeguarding lead will:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead will:

- act as a point of contact with the three safeguarding partners;
- liaise with the head teacher to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” and the designated officer at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs/ the named person with oversight for SEN at the college on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff, including making safeguarding supervision available.

Training

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills will be refreshed via e-bulletins, meeting other designated safeguarding leads and 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 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;
- 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 has access to, and understands, the school’s/college’s child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school/college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school/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;
- 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 SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead will:

- ensure the school’s/college’s child protection policies are known, understood and used appropriately;
- ensure the school’s/college’s child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body/proprietor regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school/college in this; and
- link with TWSP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the school/college the designated safeguarding lead will ensure their child protection file is transferred to the new school/college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. As a receiving school/college we will ensure key staff such as designated safeguarding leads and SENCOs/the named person with oversight for SEN in college, are aware as required.

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

Availability

During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The designated safeguarding lead (or deputy) will be available in person. Only in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

NGHS will arrange adequate and appropriate cover of a designated safeguarding lead (or deputy) for any out of hours/out of term activities and trips/residential stays/outings.