

Safeguarding and Child Protection Policy

Safeguarding and Child Protection Policy 2019/20

School Comet Nursery School and Children's Centre

Head Teacher Lisa Clarke

Named Designated Safeguarding Lead(s)

Designated Safeguarding Lead (Nursery School & Children's Centre) - Kerri MacFarland

Deputy Designated Safeguarding Lead (Nursery School & Children's Centre) - Lisa Clarke

Deputy Designated Safeguarding Lead (Children's Centre) – Katie Wetherill

Nominated Safeguarding Governor – Natasha Soares

Chair of Governors – Fran Paffard

Named personnel with designated responsibility regarding allegations against staff

Designated Senior Manager – Lisa Clarke

Deputy Designated Senior Manager – Kerri MacFarland

Chair of Governors – Fran Paffard

Nominated Governor – Fran Paffard

Safeguarding & Child Protection policy review dates

Review Date	Changes made/Details of action plan	Due Date	By Whom
September 2018	Keeping Children Safe in Education 2018	September 2019	Kerri MacFarland
September 2019	Keeping Children Safe in Education 2019	September 2020	TBC

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Introduction

Everyone at **Comet Nursery School and Children's Centre** who comes into contact with children and their families has a role to play in safeguarding children. Comet staff are particularly important in safeguarding and promoting the welfare of children as we are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Our staff form part of the wider safeguarding system for children. Comet will work with children's social care, the police, health services and others services to promote the welfare of children and protect them from harm.

This policy applies to all staff, including volunteers, contractors and/or apprentices, working in or on behalf of the school and provides information about the actions the school expect from all staff members, it will be updated annually and known to everyone working at Comet and the governing body. It will be available to parents on request and via our website.

This policy is written in line with statutory guidance for schools and colleges; Keeping Child Safe in Education (2019), Working Together to Safeguard Children (2018) and London Child Protection Procedures (5th Edition).

Everyone working at Comet shares the objective to help keep children and young people safe by:

- Providing a safe environment for children and young people to learn and develop in our school setting;
- Identifying and responding to 'early help' needs of children and families;
- Identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our school setting;
- Maintaining a culture of vigilance and an attitude of 'It could happen here'.

Comet's Commitment

Comet is committed to safeguarding and promoting the welfare of all of our pupils. Each pupil's welfare is of paramount importance. Throughout this document 'children' includes everyone under the age of 18.

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 children to have the best outcomes.

Child Protection refers to:

Procedures and actions undertaken regarding children who are at risk of being seriously harmed or have been significantly harmed.

We at Comet recognise that:

- Some children may be especially vulnerable to abuse including those missing education or with a special educational need or disability;
- Children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way; subsequently whilst at school their behaviour may be challenging;

- Children can be both victims and perpetrators of abuse;
- Children who harm others may have been maltreated themselves;
- Allegations against staff can be made, however careful and safe our recruitment practices.

The Comet approach to Safeguarding Children

Comet Nursery School and Children's Centre will ensure all staff are aware of their safeguarding and child protection responsibilities and that they are able to identify children and young people where concerns about their safety and welfare arise. We will ensure all staff and pupils know they can raise issues with the Designated Safeguarding Lead (or Deputy DSL) and that their concerns will be taken seriously. There will always be a DSL on site or on call and these staff members will have appropriate training and understanding of how to manage concerns in an effective way with the welfare of children and young people as their primary focus.

Roles and Responsibilities

Our Governing Body will ensure that:

- We have a safeguarding and child protection policy and procedures in place that are in accordance with statutory guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request and via our website;
- We operate a safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children;
- We follow the 5th Edition of the London Child Protection Procedures and the statutory guidance Keeping Children Safe in Education 2019 for dealing with allegations of abuse against staff and volunteers;
- A senior member of the school's leadership team is designated to take lead responsibility for safeguarding (and deputy);
- There is a named Governor lead for safeguarding and Designated Safeguarding Lead(s) within the school;
- Staff undertake appropriate safeguarding/child protection training, at regular intervals;
- They remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements;
- A Governor is nominated to be responsible for liaising with the LA and /or partner agencies in the event of allegations of abuse being made against the Headteacher ;
- Where services or activities are provided on the school premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and liaises with the school on these matters where appropriate;
- Policies and procedures are reviewed annually and provide information to the Local Authority about them and about how the above duties have been discharged.

Our Head Teacher, Lisa Clarke, will ensure that*:*

- The policies and procedures adopted by the Governing Body are fully implemented, and followed by all staff;
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and the deputy to carry out their roles effectively including the assessment of pupils and attendance of strategy discussions and other necessary meetings; for e.g. Child Protection Conferences and Core Group meetings;
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to

children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with the agreed Whistle Blowing Policy;

- All pupils are provided with opportunities throughout the curriculum to learn about safeguarding in an age appropriate way.
- Parents and carers are also informed about online safety and how to implement.
- Relevant staff have completed Safer Recruitment training;
- The procedure for managing allegations against staff is known to staff and included in the staff handbook, a copy of which is available at all times in the staff resource room ;
- The procedure for managing allegations effectively and refer relevant concerns to the Designated Officer (DO);
- That anyone who has harmed or may pose a risk to a child is referred to the DBS;
- A deputy senior manager is appointed to deal with allegations against staff in the absence of the Headteacher.

Our Designated Safeguarding Lead (DSL) will:

With regards to referrals

- Act as a source of support, advice and expertise within our school and have access to the online London Child Protection Procedures;
- Consult with and/or refer cases of suspected abuse or allegations to children's social care and maintain a record of all referrals which is kept in a secure location;
- Attend and contribute to safeguarding and child protection meetings as appropriate;
- Monitor and support Child in Need and Child Protection plans.
- Inform the Headteacher of all ongoing investigations and relevant information relating to safeguarding and child protection issues.

With regards to training

- Recognise how to identify signs of abuse and know when it is appropriate to make a referral to children's social care;
- Have knowledge of the CHSCB Escalation Policy, the Designated Officer (DO) role, conduct of a child protection case conference and be able to attend and contribute to these;
- Ensure that all staff have access to and understand the school's safeguarding policy;
- Ensure that all staff have induction and refresher training where necessary;
- Keep detailed, accurate and secure written records;
- Obtain access to resources and attend any relevant or refresher training courses every two years.

With regards to raising awareness

- Ensure the Safeguarding and Child Protection Policy is updated and reviewed annually and work with the Governing Body regarding this;
- Ensure parents are made aware of the safeguarding policy which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later;
- Where a child leaves the establishment, ensure the child protection file is securely transferred to the new establishment in a timely manner and separately from any other pupil files, as well as ensure the pupil's Social Worker (if relevant) is informed.

All staff and volunteers will:

Fully comply with the school's policies and procedures, attend appropriate training and inform the DSL of any concerns.

Supporting Children and Working in Partnership with Parents

- Comet Nursery School and Children's Centre recognises that the child's welfare is paramount. Good safeguarding and child protection practice and securing good outcomes for children relies on a positive, open and honest working partnership with parents/carers;
- Whilst we may, on occasion, need to make referrals to children's social care without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect children;
- Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why;
- We will endeavour to preserve the privacy, dignity and right to confidentiality of the child and parents/carers.
- The DSL will determine which members of staff 'need to know' personal information for the purpose of supporting and protecting the child.
- Staff will not be enabled to share this information further without the expressed permission of the DSL.

Partnership with Parents/Carers

Comet shares a purpose with parents/carers to keep children safe from harm and to have their welfare promoted. We are committed to working with parents positively, openly and honestly. We ensure that all parents and carers are treated with respect, dignity and courtesy. We respect parents'/carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

We will, in most circumstances, endeavour to discuss all concerns with parents/carers about their children at the earliest opportunity. However, there may be exceptional circumstances when the school will discuss concerns with children's social care and/or the police without parental knowledge (in accordance with the London Child Protection Procedures). We aim to maintain a positive relationship with all parents and carers. Comet's Safeguarding Policy is available on request and via the school's website.

Information about Safeguarding for Pupils

All children will have the opportunity to learn about safeguarding during group sessions and these will be delivered through developmentally appropriate resources and activities. For example, this may include the use of stories and puppets. Safeguarding issues such as 'stranger danger', saying 'No' alongside exploring feelings and how to share these with trusted adults are talked about in sensitive ways.

All pupils have a keyworker who establishes a close relationship to both the child and their parent(s)/carer(s). The keyworker is the child's daily contact to ensure they feel safe and secure and encourages them to build relationships with other members of staff also so that they can talk to them and share any concerns they may have.

Partnerships with Others

Comet Nursery School and Children's Centre recognises that it is essential to establish positive and effective working relationships with other agencies that are partners of the City and Hackney Safeguarding Children Board. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children and work together to secure positive outcomes.

Identifying children who may be at risk or may have been significantly harmed

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

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; **Development** means physical, intellectual, emotional, social or behavioural development; **Health** includes physical and mental health; **Ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse and Neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or 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 a stranger. They may be abused by an adult or adults, another child, children or young people. There are four categories of abuse; physical abuse, emotional abuse, sexual abuse and neglect.

Definitions and Indicators of Abuse

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

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

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

production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

- Provide adequate food and clothing, 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 caretakers);
- Ensure access to appropriate medical care or treatment;
- It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

Taking action to ensure that children are safe at Comet and home

All staff must read and follow the statutory guidance for schools and colleges including Annex A; Keeping Children Safe in Education 2019 – Part One: Safeguarding information for all staff.

It is not the responsibility of the staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the DSL or the Deputy DSL in the absence of the designated person prior to any discussion with parents.

All school staff must immediately report

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- Any explanation given which appears inconsistent or suspicious;
- Behaviours which give rise to suspicions that a child may have suffered harm;
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- Concerns that a child is presenting signs or symptoms of abuse or neglect;
- Any significant changes in a child's presentation, including non-attendance;
- Any hint or disclosure of abuse about or by a child or young person;
- Concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present);
- Information which indicates that the child is living with someone who does not have parental responsibility for them for a period of more than 28 days (Private Fostering);
- All of these concerns should be reported to the DSL using the agreed Safeguarding Alert form which can be found at Safeguarding Stations in various locations in the school and children's centre.

Responding to Disclosure

Disclosures or information that a child has been harmed may be received from pupils, parents/carers, other professionals or members of the public. Comet recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the DSL and make a contemporaneous record using clear, straightforward language.

Staff will not investigate but will, wherever possible, listen, record and pass on information to the DSL in order that s/he can make an informed decision of what to do next.

All staff will:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm;
- Clarify the information without asking leading or probing questions;
- Make a written record of what the child has said using the Cause for Concern Form (Appendix 2);
- Try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?' using the TED system as a guide: Tell me… Explain…, Describe…
- Try not to show signs of shock, horror or surprise;
- Not express feelings or judgements regarding any person alleged to have harmed the child;
- Explain sensitively to the child or young person that they have a responsibility to pass the information to the Designated Safeguarding Lead, naming the adult to reassure the child;
- Reassure and support the child or young person as far as possible;
- Not promise secrecy;
- Explain that only those who 'need to know' will be told;
- Explain what will happen next and that the child will be involved as appropriate.

Confidentiality

We will operate with regard to Information Sharing: Guidance for practitioners and managers (2018), and have a clear and explicit Confidentiality Policy. However, where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child's safety and welfare must be the overriding consideration.

Comet will ensure:

- Information is shared with Children's Social Care and/or Police where the child/young person is or may be at risk of significant harm;
- Pupil's and/or parent's confidentiality is respected;
- That any information shared is necessary, proportionate, relevant, adequate, accurate, timely and secure.

Pupil Information

Comet's record-keeping policy for child welfare and child protection is consistent with Hackney Learning Trust's guidance, which is known to all staff.

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

- Names and contact details of persons with whom the child normally lives;
- Names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Details of any persons authorised to collect the child from school (if different from above)
- Notification plus a password to be provided to use in any instance where the adult collecting a child may change;
- Any relevant court orders in place including those, which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.);
- If the child is or has been subject to a child in need, child protection or care plan;
- Name and contact detail of GP;
- Any other factors which may impact on the safety and welfare of the child.

The DSL will collate, securely store and agree access to this information. All safeguarding and child protection documents will be retained in a 'Child Protection' file, separate from the child's main school file. The main file will clearly show an alert that a child protection file exists and the location of this. This child protection file will be securely stored and only accessible to the Headteacher and the DSL. These records will be transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of DSL. Information will be retained according to Comet's policy on retention of records.

Action by the Designated Safeguarding Lead (or the Deputy Designated Safeguarding Lead in their absence)

Following any information raising concern, the DSL will:

- Consider the child's wishes and feelings, but not promise confidentiality;
- Consider any urgent medical needs of the child;
- Make an immediate referral to Hackney Children and Family Services' First Access and Screening Team if there has been a disclosure and/or allegation of abuse or there are clear grounds for concerns about the child's safety and well-being;
- Consult with a member of Children and Families Service's First Access and Screening Team if they are uncertain whether or not a referral is required or review action when a child has suffered or is likely to suffer harm (Appendix 1) or Early help and threshold criteria for intervention.

In consultation with Hackney Children and Family Services' First Access and Screening Team (FAST), decide:

- Wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk;
- Whether to make a child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately;
- Contact the designated officer for safeguarding in another agency if that agency is working with the family;

OR

- Not to make a referral at this stage, but retain the information in written notes on the child's school file;
- If further monitoring is necessary agree who and how this will be undertaken;
- If it would be appropriate to undertake an assessment (e.g. CAF) and/or make a referral for other services.

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to Social Care for children living Hackney needs to be completed using the Multi-agency Referral Form (Appendix 3). For children living outside Hackney the local authority where the child is resident will be contacted.

Action following a Safeguarding Referral

The DSL or other appropriate member of staff will:

- Maintain contact with the child's allocated Social Worker;
- Contribute to any Strategy Discussion and Strategy Meeting as required;
- Provide a report for, attend and contribute to any Initial and Review Child Protection Conference;
- Share the content of this report with the parent/carer, prior to the meeting;
- Attend Core Group Meetings for any child subject to a Child in Need Meeting for any child subject to a Child in Need Plan or Child Protection Plan;
- Where a child on a Child Protection Plan moves from the school or goes missing, immediately inform the child's Social Worker.

Dealing with Disagreements and Escalation of Concerns

Effective working together depends on an open approach and honest relationships between agencies and professionals. Problem resolution is an integral part of professional co-operation and joint working to safeguard children. Occasionally situations arise when workers within one agency feel that the actions, inaction or decisions of another agency do not adequately safeguard a child. The CHSCB Escalation Policy defines the process for resolving such professional difference and should be read alongside the London Child Protection Procedures and relevant internal policies on escalating matters of concern.

Disagreements can arise in a number of areas, but are most likely to arise around:

- Levels of need;
- Roles and responsibilities;
- The need for action;
- Progressing plans and communication.

Where professionals consider that the practice of other professionals is placing children at risk of harm, they must be assertive, act swiftly and ensure that they challenge the relevant professionals in line with this policy and be aware that:

- The safety of individual children and young people is the paramount consideration in any professional activity;
- Resolution should be sought within the shortest timescale possible to ensure the child is protected;

- As a guide, professionals should attempt to resolve differences through discussion within one working week or a timescale that protects the child from harm (whichever is shortest);
- Disagreements should be resolved at the lowest possible stage.

The DSL or other appropriate member of staff will:

- Contact the line manager in children's social care if they consider that the social care response to a referral has not led to the child being adequately safeguarded and follow this up in writing;
- Contact the line manager in children's social care if they consider that the child is not being adequately safeguarded by the child protection plan and follow this up in writing;
- Use the CHSCB Escalation Policy if this does not resolve the concern.

Providing a safe and supportive environment

Safer Recruitment and Selection

Comet Nursery School and Children's Centre pays full regard to the statutory guidance for schools and colleges; Keeping Children Safe in Education (2019) – Part Three: Safer Recruitment. We ensure that all appropriate measures are applied in relation to everyone who works in the school and who is therefore likely to be perceived and experienced by the children as a safe and trustworthy adult. This includes volunteers, supervised volunteers and staff employed by contractors.

Safer recruitment practice includes scrutinising applicants, verifying identity and academic/vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checks with the Disclosure and Barring Service (DBS).

See Appendix 5: Flowchart of Disclosure and Barring Service criminal record checks and barred list checks.

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

- DBS and barred list checks will be undertaken for all posts that are deemed regulated activity, and for all other posts an enhanced DBS check will be undertaken unless they are supervised roles that are deemed not to meet the definition of regulated activity;
- Comet is committed to keeping an up to date Single Central Record detailing a range of checks carried out on our staff;
- All new appointments to our workforce who have lived outside the UK will be subject to additional checks as appropriate;
- We ensure that supply staff have undergone the necessary checks and will be made aware of this policy;
- Identity checks that must be carried out on all appointments to our school workforce before the appointment is made, in partnership with the Local Authority (LA);
- Staff responsible for recruiting and appointing must be suitably qualified.

Safe Practice

Comet will comply with the current Guidance for Safer Working Practice for Adults who work with Children and Young People and ensure that information in this guidance regarding conduct, is known to all staff, visitors and volunteers who come into the school.

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

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Work in an open, honest and transparent way;
- Work with other colleagues where possible in situations that could be open to question;
- Discuss and/or take advice from school management over any incident which may give rise for concern;
- Record any incidents or decisions made;
- Apply professional standards respectfully in relation to diversity issues;
- Be aware of information-sharing and confidentiality policies;
- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

Positive Handling

Staff, including volunteers, are empowered to physically restrain pupils with 'reasonable force' only to prevent them from hurting themselves or others, from damaging property, or from causing disorder. See school's behaviour policy for further information.

Training and Staff Induction

The DSL and Governor with designated responsibility for safeguarding will undertake child protection training for DSL and refresher training at two yearly intervals.

All other staff, including non-teaching staff, will undertake appropriate induction training and safeguarding/child protection training to enable them to carry out their responsibilities for safeguarding effectively, which will be updated regularly, including an annual update. We will maintain a register of who has undertaken what training and when.

All staff (including temporary staff, volunteers, supervised volunteers and staff employed by contractors) are provided with the safeguarding policy and informed of safeguarding arrangements on induction. Comet will maintain a register of who has received this information and when.

Support, Advice and Guidance for Staff

Staff will be supported by Kerri MacFarland and Lisa Clarke. The DSL will be supported by Fran Paffard (Chair of Governors).

The DSL will know how to access the online London Child Protection Procedures, be aware of the CHSCB's work and policies alongside HLT's guidance.

If you are not sure whether or not to make a safeguarding referral you can contact the Children and Family Services' First Access and Screening Team to discuss your concerns on **020 8356 5500** during office hours and **020 8356 2710** out of hours.

See Appendix 4 – Key Contacts for safeguarding and child protection issues in Hackney.

Allegations regarding person(s) working in or on behalf of the school (including volunteers)

Keeping Children Safe in Education (2019) – Part Four: Allegations of abuse made against teachers and other staff)

Where an allegation is made against any person working in, or on behalf of, the school that he or she 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 would pose a risk of harm if they work regularly or closely with children (refer to statutory guidance for schools and colleges);

Whilst we acknowledge such allegations may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly, in line with agreed procedures and outcomes are recorded. All school staff will maintain a culture of vigilance based on the notion that 'it could happen here'. Staff are expected to maintain highly professional behaviours and appropriate professional boundaries at all times in line with the Code of Conduct. Staff will be encouraged to use the Whistle Blowing Policy if they have concerns regarding the conduct or behaviour of a colleague and they feel that matter has not been addressed appropriately by the school.

Any concerns regarding staff should be reported to the Headteacher, Lisa Clarke in the first instance. Concerns relating to the Headteacher should be reported to the Chair of Governors Fran Paffard at f.paffard@uel.ac.uk

Initial Action by person receiving or identifying an allegation or concern

- Treat the matter seriously and keep an open mind;
- Make a written record of the information using the Record Form (Appendix 2), including the time, date and place of incident/s, persons present and what was said and sign and date this;
- Immediately report the matter to the Headteacher or designated person (unless the allegation is against the Headteacher or designated person, in which case the Chair of Governors must be reported to).

Initial Action by the Headteacher

- Obtain written details of the concern or allegation, but do not investigate or interview child, adult or witnesses;
- Contact the Designated Officer (DO) within 1 working day;
- Discuss with the DO next steps using the London Child Protection Procedures Flow Charts Allegations/Concerns Against Staff (Appendix 4,5,6);
- Inform the Chair of Governors of the allegation.

Subsequent Action by the Headteacher (or designated person)

- In consultation with the DO conduct a disciplinary investigation, if an allegation indicates the need for this;
- Contribute to the child protection process by attending professional strategy meetings;

- Maintain contact with the DO;
- Ensure clear and comprehensive records regarding the allegation, and action taken and outcome are retained on the staff member's personnel file;
- Consider along with Human Resources and the DO whether a referral to the DBS should be made.

Further Information on Safeguarding Issues

Safeguarding covers more than the contribution made to child protection in relation to individual children. It also encompasses issues such as pupil health and safety, bullying, arrangements for meeting the medical needs of children providing first aid, school security, drugs and substance misuse, gang related activity and promoting positive behaviour. Determining the most appropriate agency to consult with or refer to should be made by referring to the Children and Young People's Services Resource Guide for Professionals.

Bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. Stopping violence and ensuring immediate physical safety is obviously our first priority but emotional bullying can be more damaging than physical.

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, can have a significant effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying must be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing safeguarding procedures.

For further information please see the DfE's Guidance and our school's Anti-bullying Policy.

Online Safety

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material;
- Contact: being subjected to harmful online interaction with other users;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Comet recognises that its pupils will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from

sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, behaviours, web cam photography or face-to-face meetings. Comet Nursery School and Children's Centre will encourage parents to supervise their children online and to consider measures that may want to put in place to keep their children safe online.

Filters and monitoring

Comet Nursery School and Children's Centre does all it can to limit children's exposure to risks online. Children's use of the internet is always supervised and the school has filters in place which protect for inappropriate access. Any person visiting Comet are told that the use of mobile phones is not permitted.

There is a wealth of information available to support schools and parents in keeping children safe online. We refer to the following to keep abreast of risks and what information may be relevant to pass on to parents and carers:

- www.thinkuknow.co.uk
- www.disrespectnobody.co.uk
- www.saferinternet.org.uk
- www.internetmatters.org
- www.childnet.com/cyberbullying-guidance
- www.pshe-association.org.uk
- http://educateagainsthate.com/
- www.gov.uk/government/publications/the-use-of-social-media-for-onlineradicalisation
- www.gov.uk/UKCCIS- external visitors and online safety

Photography and Images

The vast majority of people who take or view photographs or videos of children do so for entirely understandable and acceptable reasons. However, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

To protect pupils we will:

- Seek parent or carers consent for photographs to be taken or published (for e.g. on our website or in newspapers or publications). This is discussed during the child's home visit and parents are asked to sign a consent form at this point;
- Use only the pupil's first name with an image;
- Ensure pupils are appropriately dressed;
- Only use our equipment to make images of children (no personal devices are permitted for this purpose);
- Encourage parents to tell us if they are worried about any photographs that are taken of them and if they wish to make any amendments to previously provided consent.

Children Missing from Education

A child going missing from education is a potential indicator of abuse or neglect. Although nursery children are not subject to the guidelines as those in statutory education, Comet still takes this matter seriously. All absences are recorded and when a parent or carer fails to inform the school, we will contact them. Should attempts to contact a family be unsuccessful, a member of the designated

safeguarding team may attempt a home visit accompanied by another member of staff. In some cases, a referral to FAST will be made where there is due concern for a child's safety.

Children who harm others

Comet recognises that the harm caused to children by the harmful and bullying behaviour of other children can be significant. Children who harm others should be held responsible for their harmful behaviour and the school staff alerted to the fact that they are likely to pose a risk to other children in the school, home and community.

Where this harm involves sexual abuse, serious physical or serious emotional abuse, the safeguarding procedures set out in this policy will be applied. This school recognises that children who harm others are likely to have considerable needs themselves and may have experienced or be experiencing significant harm themselves.

Where a child has caused significant harm to another child, through sexual abuse or serious physical or emotional abuse, the school will make separate referrals to Children's Social Care of the victim(s) and perpetrator(s).

Such children and young people are likely to be children in need, and some will, in addition, be suffering, or at risk of suffering, significant harm, and may themselves be in need of protection. Children and young people who abuse others should be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others.

The London Borough of Hackney have produced guidance regarding Multi-agency Planning (MAP) Meetings for children and young people who present a risk of demonstrating harmful sexual behaviour.

Comet will be mindful of the sections in the London Child Protection Procedures concerning 'Harming Others' and work closely with social care, the police and other agencies following a referral.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

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.

Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess. The indicators for child sexual exploitation can sometimes be mistaken for 'normal adolescent behaviours'. It requires knowledge, skills, professional curiosity and an

assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly and appropriate support is given. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something); for the victim and/or perpetrator or facilitator.

Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). It is critical to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a child/young person does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Whilst there can be gifts or treats involved in other forms of sexual abuse (e.g. a father who sexually abuses but also buys the child toys) it is most likely referred to as child sexual exploitation if the 'exchange', as the core dynamic at play, results in financial gain for or enhanced status of, the perpetrator. Where the gain is only for the perpetrator/facilitator, there is most likely a financial gain (money, discharge of a debt or free/discounted goods or services) or increased status as a result of the abuse. If sexual gratification, or exercise of power and control, is the only gain for the perpetrator (and there is no gain for the child/young person) this would not normally constitute child sexual exploitation, but should be responded to as a different form of child sexual abuse.

If we are concerned a child is being sexually exploited we will follow the procedures set out in this document and make reference to the guidance provided by CHSCB. This further Governmental guidance can be useful when considering cases of CSE.

Peer on Peer Abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

Child Criminal Exploitation

As set out in the Serious Violence Strategy, published by the Home Office, criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges, with research stating that SEND children can be up to four times more likely to be abused due to additional vulnerabilities. As a school we will ensure a culture of vigilance that reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises 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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

If we are concerned we will follow the procedures set out in this document and make reference to the guidance provided by CHSCB.

Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a mandatory duty upon that individual to report it to the police.

FGM Mandatory Reporting Duty

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 social workers and healthcare professionals, 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, 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.

Preventing Radicalisation and Extremism

We will fulfil our responsibilities under the Prevent Duty, it is essential that staff are able to identify parents, adult and children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We aim to build pupils' resilience to radicalisation by promoting fundamental British values in an age appropriate manner.

Further information on so-called 'honour-based' violence

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 Draft for consultation 67 wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

It is the responsibility of the Governing Body to monitor the effective deployment of this policy. This has been delegated to the Learning and Development Team.

This policy will be reviewed on an annual basis.

Signature: _____ Date: _____

Name: _____
Chair of Governors

Signature: _____ Date: _____

Name: _____
Head teacher

Review Date: September 2020

Appendix 1

Safeguarding Alert Form (Page 1):

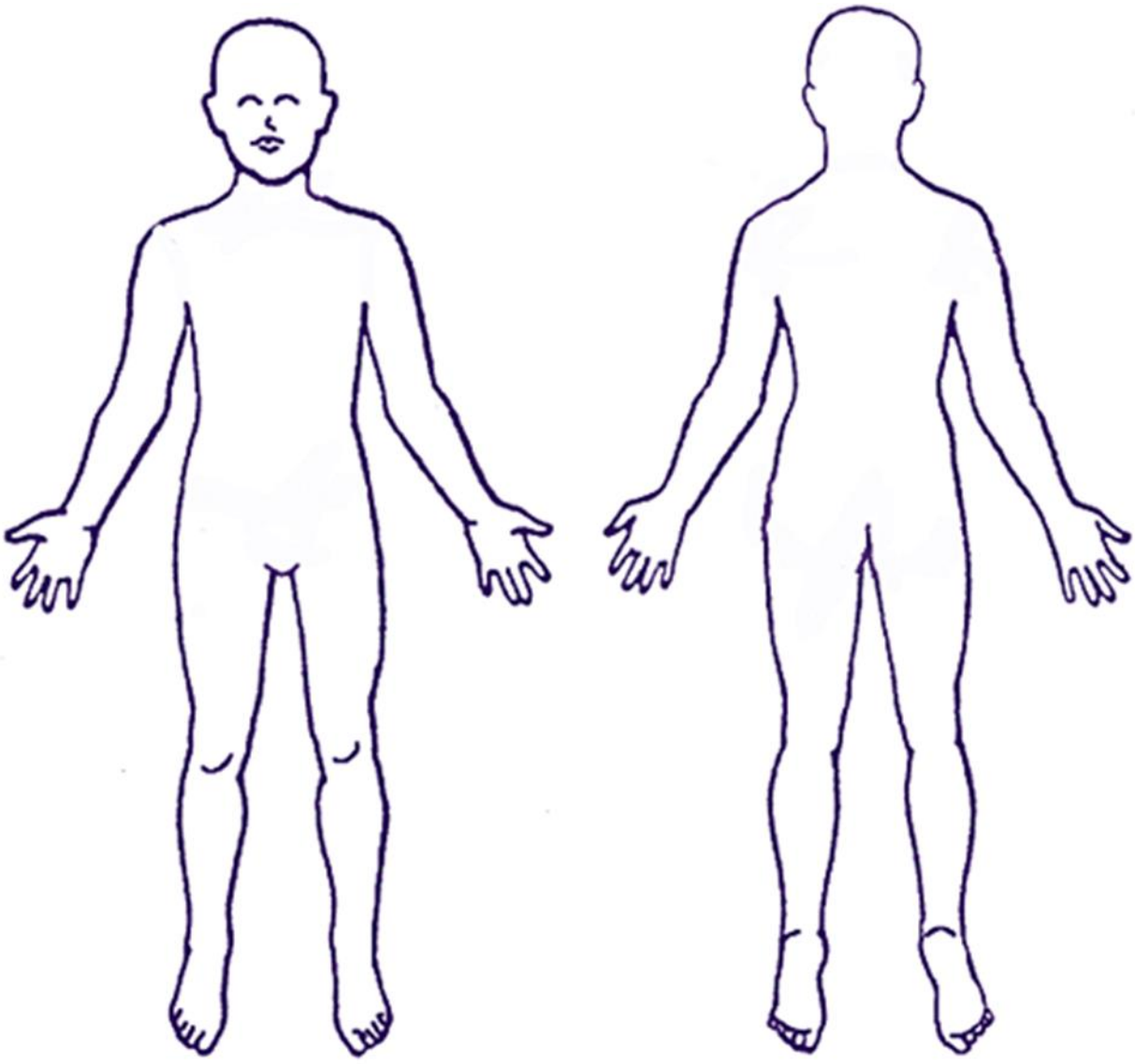
Name of child:	Date & time of incident:
Location of incident:	Date & Time of record:
Name of person reporting:	Signature of person reporting:

Concern/Incident – Describe your concern using clear, straightforward language: Opinion: How does this fit with what you know about the child?			
Next Step			
No action	Monitor	Speak to parents	Referral

Appendix 1

Safeguarding Alert Form (Page 2) – Body Map

This body outline can be used to record marks and/or bruises and the date of occurance or observation and should be kept in the Child Protection File of the child.



Appendix 2

Agency referral to Hackney Children's Social Care

Referral form for use by all agencies.

PLEASE NOTE THAT A WRITTEN REFERRAL FORM IS REQUIRED IN ALL CASES. WHERE A TELEPHONE REFERRAL HAS BEEN MADE BECAUSE OF THE URGENCY OF A SITUATION THIS MUST BE FOLLOWED UP WITHIN 48 HOURS BY A COMPLETED REFERRAL FORM UNLESS AGREED OTHERWISE.

Name and contact details of person making the referral			
Name:			
Name of agency/organisation:			
Address:			
Telephone Number:		**Fax Number:**	
Email Address:			
Date written referral is being made:			
Date telephone referral made (if applicable) and to whom:			
Relationship of person making the referral to the child/family:			

NAME(S) and DATE(S) OF BIRTH of the child(ren) being referred (please list here all children in the family):				
Child(ren)'s preferred language if not English speaking:				
Ethnic origin and Nationality if known:				
Details of wider social and professional network (e.g. significant family / friends, GP, health visitor, schools, professionals working with members of the household)				
Name	**Role/ Relationship**	**Address**	**Telephone number**	**Email**

Name of parent(s)/carer(s) with whom child(ren) live(s):	
Parent(s)/Carer(s) preferred language if not English speaking:	
Address:	
Telephone number(s):	
Any other relevant family details:	

Why is a referral being made? What are the concerns? (Please be as specific as possible, giving dates, examples of incidents etc):	
Is the referral for information only?	
Is there evidence that any children in the family are being subject to significant harm?	

If 'YES' please specify:
Actions taken by referring agency/involvement with the family:
Please outline your involvement with the child/family and any ongoing support that is being provided. Detail any past concerns or known involvement of statutory agencies. If a CAF or other assessment document has been completed please attach a copy to this referral.
What outcomes are anticipated by the referral?

Does the person with parental responsibility know that a referral to Children's Social Care has been made?	

If 'No' please explain why:

If yes, does the person with parental responsibility consent for members of the family's network to be contacted to obtain further information?	

Any other information that would be helpful in deciding the priority of the referral and/or understanding the actions Children's Social Care is being asked to take in respect of the child(ren) being referred?
Please e-mail this form to cscreferrals@hackney.gov.uk for the attention of the Referral Manager. If you need to send it to a secure email address please send to cscreferrals@hackney.gov.uk.cjsm.net or to cscreferrals@hackney.gcsx.gov.uk If you have difficulties sending this by email please fax it to 020 8356 5516/7. Should you need any assistance in completing this form or wish to follow up your referral please call the First Response Service on **020 8356 5500**. If your referral has not been acknowledged by Children's Social Care within three working days please make contact to confirm it has been received. ***Please ensure that you have sent a copy of this referral to the safeguarding children lead for your agency.***

Appendix 3
Hackney Key Contacts and Guidance

Useful Contact Details:

- Hackney First Access and Screening Team (FAST): 020 8356 4844/5500
- Hackney Out of Hours: 020 8356 2710
- Child Abuse Investigation Team (CAIT) @ Police: 020 8217 6537
- HLT Safeguarding in Education Team: 020 8820 7255
- Designated Officer (DO): 020 8356 4569
- City & Hackney Safeguarding Children Board: 020 8356 4183
- NSPCC- 24-hour Helpline: 080 8800 5000
- Disclosure and Barring Service (DBS): www.gov.uk/dbs

Useful guidance documents:

Hackney Well-being Framework and Resource Guide:

https://www.hackneyservicesforschools.co.uk/system/files?file=extranet/Children%20and%20Young%20Peoples%20Services%20Resource%20Guide.pdf

London Child Protection Procedures:

http://www.londoncp.co.uk/

Working Together to Safeguard Children:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf

Keeping Children Safe in Education:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/737289/Keeping_Children_Safe_in_Education_Sept_2018.pdf

What to do if you are worried a child is being abused:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Information Sharing Guidance for Practitioners:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

London Borough of Hackney Code of Conduct:

http://staffroom.hackney.gov.uk/code_of_conduct_policy_booklet.pdf

HLT Whistle Blowing Policy:

http://intranet.hackney.gov.uk/article/2050/Whistleblowing-anti-fraud-and-corruption