Wakefield Grammar School Foundation

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Consultation	WGHS Head QEGS Head
Checker Person Name / Title **Quality Assurance**	Penny Plumpton, Safeguarding Governor
Name of Approver / Committee **Date Ratified**	Nominated Safeguarding Governor, P Plumpton and Full Board 31.08.2023 (Full Governing Board)
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VALIDITY – Policies should be accessed via the Foundation intranet to ensure the current version is used.
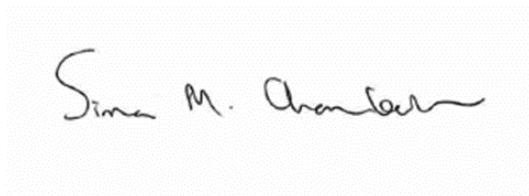
CHANGE RECORD - REVIEW PERIOD ANNUALLY

Version	Date	Change details
V1.00	Sept 2022	Created, L Ladds, E Gill
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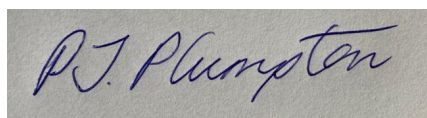
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Authorisation and Review

Signed………………………………………… Date: 31.08.23   Chair of Governors

Signed………………………………………… Date: 31.08.23   Nominated Safeguarding Governor

Signed…………………………………………Date: 31.08.23   Deputy Nominated Safeguarding Governor

Signed………………………………………… Date: 31.08.2023   Head, WGHS

Signed………………………………………… Date: 31.08.23   Head, QEGS

Signed…   …………. Date: 31.08.23   Head, WGPPS

Next scheduled review: August 2024

WGSF Safeguarding and Child Protection Policy

1.　**Introduction**

The Wakefield Grammar Schools Foundation is committed to safeguarding and promoting the welfare of children and young people and expects all those who work for and on behalf of the schools of the Foundation to share this commitment. The policy applies to all three schools with an additional annex for WGPPS.

The Foundation recognises the importance of children receiving the right help at the right time to address risks and to prevent issues from escalating; the importance of acting on and referring the early signs of need, risk, abuse and mental health problems; keeping clear records; listening to the children's views; reassessing concerns when situations do not improve, sharing information quickly and challenging inaction, whilst recognising that children may not feel ready or know how to tell someone that they are being abused.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education 2023 Statutory Guidance (KCSIE)
- Working Together to Safeguard Children (2023)
- Relationships, Sex and Health Education (September 2021)
- Prevent Duty Guidance (2023)
- The use of social media for online radicalisation (July 2015)
- The Human Rights Act 1998 - GOV.UK
- Equality Act (2010)

This policy also takes into account the procedures of Wakefield Council, as part of the inter-agency safeguarding procedures set up by the Wakefield Safeguarding Children Partnership ('WSCP'). A full copy of the WSCP's procedures can be found at https://www.wakefieldscp.org.uk.

This policy should be read in conjunction with the following policies which are all available on the website:

WGSF Low Level Concerns Policy

WGSF Recruitment, Selection and Disclosure Policy

WGSF Whistleblowing Policy

WGSF Child on Child Abuse Policy

WGSF SEND Policy

WGSF ICT Acceptable Use Policy

WGSF Staff Code of Conduct

WGPPS Intimate Care Policy

2. Contacts (Internal)

The Designated Safeguarding Leads (DSLs) and Deputies (DDSLs) at each Foundation School are listed below:

2.1 Wakefield Pre-Preparatory Grammar School (EYFS to Year 2) – 01924 231618
Designated Safeguarding Lead + Designated Safeguarding Lead for Early Years:
Mrs Emma Gill (Headteacher) ext 266

Deputy Designated Safeguarding Leads:
Mrs Lynne Butler (Deputy Head) ext 266
Mrs Jenny Taylor (Assistant Head/Pastoral Lead)

2.2 Queen Elizabeth Grammar School (Year 3 to Year 13) – 01924 373943
Designated Safeguarding Lead:
Mr Jim Palin (Deputy Head) ext 323

Deputy Designated Safeguarding Leads:
Mr James Tiffany (Pastoral Lead KS2) ext 370
Mrs Claire Gratrick (School Nurse) ext 313
Mr James Jones ext 327/328
Mrs Leila Ramsden ext 366

2.3 Wakefield Girls' High School – Senior Section 01924 372490, Junior Section 01924 373821
Designated Safeguarding Lead:
Mr James Harris (Deputy Head) ext 371

Deputy Designated Safeguarding Leads:
Mrs Judith Tingle (Deputy Head - Academic) ext 208
Mrs Kirsty Varley (Head of Year 10/11) ext 201
Mr Sam Rowley (Section Lead) ext 243
Mrs Vanessa Hutchinson (Wellbeing Officer) ext 243

The nominated Safeguarding and Child Protection Governor is Mrs Penny Plumpton. The Deputy Safeguarding and Child Protection Governor is Mrs Fran Galbraith. They can be contacted via the Governors' Office on 01924 231600.

Chair of the Governors is Mr Simon Chamberlain and he can be contacted on 01924 231600.

3.   Contacts (External)

Police – emergency: 999; non-emergency and for e.g. reporting FGM: 101

WSCP Local Authority Designated Officer (LADO) Mark Wilkinson, Tel: 01977 727032
Mobile: 07711 797847, Lado Email lado.referrals@wakefield.gov.uk

WSCP Social Care Direct – 0345 850 3503 (open 24 hours)
social_care_direct@wakefield.gov.uk

Prevent – Wakefield Community Safety Team communitysafety@wakefield.gov.uk 01924
306645 or 01924 306776 or 07468 700810 or 07827 955425

wd.prevent@westyorkshire.pnn.police.uk or 07789 753634 or 07590 357469.

Wakefield Council Prevent Lead - 07825 281312

Department for Education – Counter Extremism Helpline - 0207 340 7264

NSPCC Whistleblowing Advice line – 0800 028 028

4. **Terminology**

Child: refers to everyone under the age of 18. This policy in effect applies to all pupils, including those who are over the age of 18.

Safeguarding: Protecting children from maltreatment. Preventing the impairment of their mental and physical health or development; Ensuring that they grow up in circumstances consistent with the provision of safe and effective care; Taking action to enable the best outcomes.

Child protection: refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.

Early Help: providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. It is about providing support quickly whenever difficulties emerge to reduce the impact of problems.

Early Help Assessment: All Early Help assessments offer a basis for early identification of a child's additional needs, the sharing of this information between organisations and the coordination of service provision. Early Help assessments require consent and should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The findings from early help assessments may give rise to concerns about the child's safety and welfare. In these circumstances, it should be used to support a Referral to Children's Social Care; however this is not a prerequisite for making a referral in emergency circumstances.

CAF: Common Assessment Framework is one form of Early Help inter-agency assessment. Signs of Safety is another example of an assessment form. Any Early Help assessment can be used in Wakefield.

EIP Service: Early Intervention and Prevention Service

TAC/F/S/EY: Team around the Child/Family/School/Early Years

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Parent refers to birth parents and other adults who are in a parenting/carer role, for example step-parents, foster carers and adoptive parents.

LADO: Local Authority Designated Officer; a post in the local authority, to coordinate and manage allegations against staff.

Social Care MASH: Wakefield's children's social care/Family services/Integrated Front Door/Multi Agency Safeguarding Hub

ACES - Adverse Childhood Experiences

CiC: Child In Care

CAMHS: Child and Adolescent Mental Health Service

Continuum of Need: outlines the different levels of support for children and families in Wakefield District.

DSL: Designated Safeguarding Lead. Each School will have a team of a DSL and one DDSL. Their job description is included in the appendices.

FIM: Future in Mind. Program to help in promoting, protecting and improving our children and young people's mental health and wellbeing

KCSIE: Keeping Children Safe in Education (Statutory guidance)

MARF: Multi Agency Referral Form used in Wakefield District

Restorative Approach: using language and skills to reduce conflict and foster relationships in order to help people reach sustainable solutions to problems. This is the overarching aim of any work and training in Wakefield district.

Signs of Safety: an approach to family intervention work, used across the Continuum of Need.

Wakefield Families Together – Connecting Practice Approach now used in Wakefield.

WSCP Wakefield Safeguarding Children Partnership. This has replaced WDSCB Wakefield District Safeguarding Children Board.

*Where the term reporting person is used in the policy, schools may also use the term 'victim'

Where the term reported person is used, schools may also use the term 'alleged perpetrator'

This policy is closely aligned to the Wakefield Safeguarding Children's Partnership however, the schools follow the relevant protocols for the different authorities in which our children reside.

5. Safeguarding

Safeguarding and promoting the welfare of children are defined as protecting children from maltreatment; preventing the impairment of their mental and physical health or development; Ensuring that they grow up in circumstances consistent with the provision of safe and effective care; Taking action to enable the best outcomes.

The schools have a duty to consider at all times the best interests of the child. Safeguarding and promoting the welfare of children are of paramount importance and are everyone's responsibility and all staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. This means staff need to pass on any concerns to their DSL immediately. The role of the DSL and their duties is shared with staff (this can be found in Appendix 1). There are a range of safeguarding issues which may face pupils and of which staff need to be aware (Appendix 2).

5.1 The Foundation will take all reasonable measures to:

- ensure that it practises safe recruitment in checking the suitability of staff, governors and volunteers (including staff employed by another organisation):
    - only accept a curriculum vitae alongside a full application form as a CV is not sufficient on its own to support safer recruitment;
    - ensure that online searches as part of their due diligence checks on shortlisted candidates are made and recorded - this is to identify any incident or issues that may have happened and are publically available online, which the Foundation may want to explore at interview
- ensure that all staff are made aware of the Foundation's safeguarding arrangements as part of their induction
- ensure that appropriate child protection checks and procedures apply to any staff employed by another organisation who work with the schools' pupils on another site;
- ensure that during both term time and holiday periods, the DSL or DDSL (all DDSLs having been trained to the same level as the DSL) is always available. During holiday periods, a rota may be in place.
- ensure that all staff conduct themselves appropriately at all times, in accordance with the WGSF Staff Code of Conduct which details expectations of behaviour which not only uphold high professional standards but also avoid placing staff at risk of harm or allegations of harm to a pupil
- ensure that all visiting speakers are suitable and appropriately supervised
- ensure that all visitors are asked to sign in and wear a badge which will be handed to them. All visitors will be asked to read the WGSF Safeguarding leaflets on arrival at the school office / reception and be accompanied by a member of staff at all times;
- follow the local inter-agency procedures of the WSCP and share information about concerns with other statutory agencies
- ensure that all staff know that they have a responsibility to identify children who may be in need of extra help, or who are suffering, or likely to suffer, significant harm; that they must act immediately on any concern they may have about a child's welfare; that all know how to recognise, respond, record and refer, in accordance with WT; and that although referrals are usually managed by the DSL, safeguarding is everyone's responsibility and anyone may refer a child to Social Care Direct if necessary

- ensure that all staff appreciate the importance of offering early help, in order to minimise distress and to try to prevent an issue from escalating
- protect children from any form of abuse, whether from an adult or a pupil, or pupils, and require all staff to be alert to any signs of abuse and deal appropriately with every suspicion or complaint of abuse
- ensure that all staff recognise the potential for child-on-child abuse and also the particular vulnerabilities of children with SEND, mental health problems and LGBTQ+
- establish an open environment where staff are prepared to raise concerns and feel able to challenge inaction or procedures which they feel are inappropriate:
- establish a positive and supportive environment in which children feel that they are able to express their concerns and that any issues they may raise will be taken seriously and acted on as appropriate;
- always to listen to the voice of the child and take this into consideration when reaching decisions, though there may be circumstances where the child's wishes may have to be overridden in order to act in the child's best interests
- teach children how to keep safe, including in its curriculum provision, to equip them with the knowledge and skills they need to stay safe from all forms of abuse, particularly by promoting the safe use of electronic equipment and the internet
- ensure that senior pupils given positions of responsibility over other pupils are briefed on appropriate action to take should they receive an allegation of abuse or have concerns about a pupil's mental health or general wellbeing.

5.2   What staff should do if they have concerns about a child in need of additional support

If staff have any concerns about a child (excluding the child having suffered or being likely to suffer significant harm) who appears to be in need of additional support, they should speak to the DSL to discuss a course of action. If it is agreed that the child may benefit from early help, the DSL will consider the appropriate action to take in accordance with the WSCP referral threshold document. Parents would normally be involved, unless such involvement would not be in the best interests of the child: parental consent is not required for referrals to statutory agencies. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. The matter will be kept under review and consideration given to a referral to Social Care Direct if the child's situation does not appear to be improving. Staff should challenge any inaction and follow this up with the DSL and Social Care Direct as appropriate. All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing.

5.3   What staff should do if a child is has suffered or is likely to suffer significant harm

In these circumstances, staff should make an immediate referral to Social Care Direct and, if a crime may have been committed, to the police. The 'significant harm' may take the form of one of the four categories of abuse listed below. This referral would normally be made by the DSL, but, if necessary, anyone may make a referral. Any such referral must be made immediately and in any event within 24 hours /1 working day of staff being aware of the danger or risk. Again, parental consent is not needed for referrals to statutory agencies such as the police or Social Care Direct. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and Social Care Direct as appropriate.

All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing.

5.4   Responding to concerns

A member of staff hearing any concern, complaint, disclosure or allegation of any form of abuse must:

- listen carefully and always calmly to the pupil and keep an open mind, not being judgmental as to whether anything untoward has taken place;
- avoid criticism of the pupil (e.g. for not making the disclosure earlier);
- not ask leading questions;
- reassure the pupil, but must not give a guarantee of absolute confidentiality;
- explain that they may need to pass the information on to the DSL in accordance with this policy so that the correct action can be taken;
- not initiate any sort of investigation;
- if recording bruises or injury, indicate position, colour, size and shape on a body map; not require the pupil to undress and not photograph an injury;
- when the pupil has finished, make sure that the pupil feels secure, and explain what the interviewer is are going to do next;
- keep as accurate a record of the contents of the conversation as possible, using names, not initials, and including the date, time and place of the conversation; make sure that the record is factual and reflects the words of the pupil, not the interviewer's opinion;
- reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harrasment and no victim will ever be made to feel ashamed for making a report.

5.5   Preserving evidence: The written record and all other evidence (e.g. scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed to the DSL at the earliest opportunity (or to the Head if the DSL is the subject of the concern). No copies must be kept.

All schools within the Foundation use the CPOMS online recording system and information is shared between the DSLs as appropriate.

5.6   Wakefield's Continuum of Need

Wakefield has a Continuum of Need for children and families who need support. This ranges from Level 1 to Level 4. It is worth noting that a cause for concern does not always require a Level 4 response: it may be that the family needs a lower level of support to help the situation.

Level 1 – Universal services are meeting the child's needs – no extra intervention needed.

Level 2 – For example, a universal service is providing extra support, or has referred to one other single agency.

Level 3 – Multi-agency early help approach to support. First Hub and Team Around the School (TAS) arrangements may be able to support.

Level 4 – Statutory intervention and assessment are needed where a child is at risk of or currently suffering significant harm. Social care and/or police assess, investigate and lead at this level.

The Wakefield Families Together website provides a great deal of advice and support. First Hub, (TAS) arrangements and school link workers are able to direct school staff and offer support.
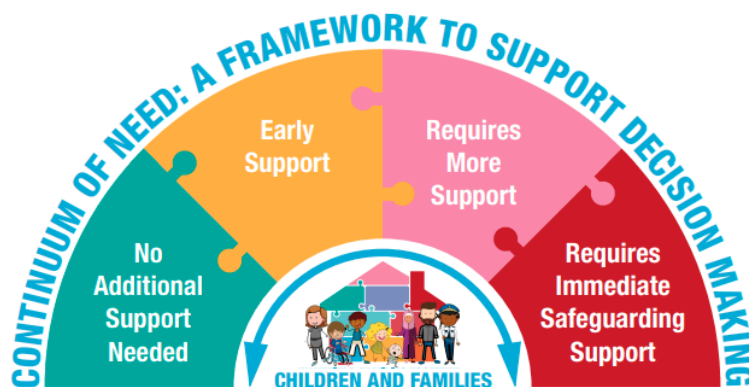
5.7   Children who may be particularly susceptible

The Foundation recognises the Equality Act (2010) Equality Act 2010: guidance and such:

- Must not unlawfully discriminate against pupils because of their protected characteristics;
- Must consider the support given to pupils with protected characteristics
- Must take positive action, where proportionate, to deal with the disadvantages these pupils face.

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

- disabled or have special educational needs (SEND);
- have certain medical conditions;
- young carers;
- children who need a social worker;
- children in care and those recently returned to family from care;
- Children who are absent from education for prolonged periods and/or repeated occasions;
- privately fostered;
- LGBTQ+;
- asylum seekers;

- living transient lifestyles;
- not a pupil with English as a first language;
- affected by domestic abuse/substance misuse/drug use/parental mental health issues;
- affected by mental health issues including self-harm and eating disorders;
- affected by poor parenting;
- at risk of fabricated or induced illness;
- at risk of gang and youth violence;
- living away from home or homeless;
- susceptible to being bullied, or engaging in bullying including cyber, homophobic, racist etc.
- missing from home or care;
- living in chaotic and unsupportive home situations;
- susceptible to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- susceptible to extremism or radicalisation;
- susceptible to faith abuse;
- involved directly or indirectly in child sexual or criminal exploitation;
- at risk of Honour Based Violence/Abuse (HBV/A) including female genital mutilation (FGM), forced marriage and breast ironing.

This list provides examples of susceptible groups and is not exhaustive.

6. Types and signs of abuse

All staff should be aware of indicators of abuse and neglect and be aware that any type of harassment, violence or abuse may breach a child's human rights as set out in the Human Rights Act 1988.

They should also be aware that abuse, neglect and safeguarding issues are rarely standalone events: in most cases, multiple issues will overlap. Safeguarding incidents and/or behaviours can be associated with factors outside the school. All staff, but especially the DSLs and DDSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. 'Contextual safeguarding' or 'extra-familial harm' refers to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers often have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. These may relate to, for example, sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Online child-on-child abuse can take the form of abusive, harassing and misogynistic messages, non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not wish to receive such content.

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of abuse such as exploitation. Children and young people can be groomed online or face to face, by a stranger or by someone they know, for example, a family member, friend or member of staff. Groomers may be male or female. They could be any age. Many children and young people do not understand that they have been groomed or that what has happened is abuse.

6.1 Physical 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.

6.2 Emotional abuse

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 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.

6.3 Sexual abuse

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.

6.4 Neglect

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, 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.

7. Signs of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, because they are ashamed or embarrassed, or their abuser has threatened them or they don't want the abuser to get into trouble. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.

A child who is being abused or neglected may: (this list is not designed to be a checklist)

- have bruises, burns, fractures or other injuries which do not have a plausible explanation; e.g: bruises on babies who are not yet mobile; bruises on cheeks, ears, palms, arms, feet, back, buttocks, tummy, backs of legs; bruises in clusters; bruises with finger/belt marks; cigarette burns;
- challenge authority, have outbursts of anger or poor behaviour;
- be reckless with regard to their own or others' safety;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- display affection or attention-seeking behaviour;
- regularly flinch at sudden but harmless actions, e.g. raising a hand;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- self-harm, including head banging and developing eating disorders;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display violence or sexualised behaviour towards animals, toys, peers;
- regress to the behaviour of a younger child;
- become uninterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about, drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age;
- have unexplained gifts or money or mobile phones;
- be over-secretive online;
- have low self-esteem;
- steal or scavenge compulsively;
- be overly affectionate to strangers or people they haven't known for very long; or

- display traumatic mutism.

Responses from parents that may cause concern about possible abuse :

- unexpected delay in seeking medical or dental treatment which is obviously needed;
- denial of any injury;
- explanation that differs from that of the child, for instance concerning bruising
- claims of falls or fits, etc., that never happen in school;
- unrealistic expectations or constant complaints about the child;
- lack of interest in the child;
- alcohol or drug misuse;
- mental health issues which affect parenting;
- requesting the removal of a child;
- domestic abuse.

Other signs to consider, with SEND children :

- force-feeding;
- over-medication;
- bruising if non-mobile;
- poor toileting arrangements;
- lack of stimulation;
- unjustified use of restraint;
- rough handling;
- unwillingness to learn the child's means of communication;
- ill-fitting equipment;
- misappropriation of the child's finances;
- invasive procedures;
- non-consideration of a child's dignity.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL team decide how to proceed.

8. **Allegations of child-on-child abuse**

All staff should recognise that children can abuse other children, including online. This is generally referred to as child-on-child abuse and can take many forms.

These can include (but are not limited to)

- bullying (including cyberbullying);
- prejudice based and discriminatory abuse;
- gender-based violence;
- sexual violence and sexual harassment;
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as 'sexting' or youth-produced sexual imagery);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party;
- upskirting (a criminal offence) which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- initiation/hazing-type violence and rituals.

Child-on-child abuse may also occur within a family environment (intra-familial harm) and support for siblings following incidents may be necessary.

Evidence shows that girls, children with SEND, children with some medical conditions and LGBTQ+ children are at greater risk. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported (this could be due to communication barriers or difficulties in managing or reporting these challenges). Provision is made for all children, particularly LGBTQ+ children, with safe spaces for them to speak out or share their concerns with members of staff. As with all safeguarding matters, staff must recognise that 'it could happen here'.

The schools take the following steps to minimise child-on-child abuse:

- taking a whole-school approach to safeguarding and child protection;
- giving training to staff;
- providing a clear set of values and standards, underpinned by each school having its own behaviour policies, pastoral support system and assemblies;
- allocating time in PSHE/RSHE lessons for instruction and discussion of what constitutes appropriate and inappropriate behaviour.

It is stressed that pupils may confidently report abuse, knowing that their concerns will be treated seriously.

Everyone has a role to play in identifying concerns, sharing information and taking prompt action in the best interests of the child. Staff should be aware of the importance of making clear that child-on-child abuse is never acceptable and should take a zero tolerance approach. Such abuse should never be passed off as 'banter', 'part of growing up' or 'boys will be boys'. Staff should challenge all inappropriate behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, flicking bras, lifting skirts and pulling down trousers. Dismissing or tolerating such behaviour risks normalising it.

A bullying incident or issue of child-on-child abuse will be treated as a child concern if there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

All incidents of bullying and child-on-child abuse must be reported to the DSL.

A pupil against whom an allegation of abuse has been made may be suspended by the school during the investigation. The school will take advice from the WSCP on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the reporting person(s) and reported person(s). If it is necessary for a pupil to be interviewed by the police in relation to an allegation of abuse, the

school will ensure that, subject to the advice of the WSCP, parents are informed as soon as possible and that the pupil involved is supported during the interview by an appropriate adult and until the investigation is completed. A child with SEND will be appropriately supported to reduce any additional barriers that may prevent the recognition and discussion of abuse. All children involved in an allegation of child-on-child abuse will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed in order to provide appropriate support.

The Foundation recognises;

- the importance of explaining to children that the law is in place to protect rather than criminalise them;
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents

The DSL will keep secure records of all incidents.

9. **Youth Produced Sexual Imagery**

Making, possessing and distributing sexual (i.e. nude and semi-nude) photos and videos of under-18s is illegal. When an incident involving sexting comes to the school's attention, the following steps should be taken:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the young people involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- If at any point in the process there is a concern that a young person has been significantly harmed or is at risk of significant harm a referral should be made to Social Care Direct and/or the police immediately.

Adults should not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible, responses to incidents should be based on what the DSL has been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL and should always comply with this Safeguarding and Child Protection Policy and procedures. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the young person.

Further details on searching, deleting and confiscating devices can be found in the [DfE Searching, Screening and Confiscation advice](#). This advice highlights that schools have the power to search pupils for devices, search data and delete youth produced sexual imagery. If any devices need to be seized and passed to the police, then the device(s) should be confiscated and the police should be called. The device(s) should be turned off and placed under lock and key until the police are able to come and retrieve it.

Children who are absent from education for prolonged periods and/or repeated occasions (previously children missing from education)

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absence, particularly where children go missing on repeated occasions. We follow the DfE requirements for schools in respect of recording and reporting children who leave school with no known destination and will report to the local authority where a child is going to be deleted from the pupil roll in certain applicable circumstances. We will inform the local authority in line with local Wakefield procedures of any pupil who fails to attend for a continuous period of 10 days.

10. **Allegations Against a Member of Staff**

The schools' procedures, which follow those detailed in part 4 of [KCSIE 2023 Statutory Guidance,](#) for managing allegations against staff who are currently working at one of the schools apply when a member of staff has or is alleged to have behaved in a way that has harmed a pupil, or may have harmed a pupil; possibly committed a criminal offence against or related to a pupil; behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; or behaved or may have behaved in a way that indicates that they may not be suitable to work with children.

An allegation against a member of staff that meets the harm threshold above should be referred to the Head, who, as the 'case manager', will consult with the LADO within one working day of the allegation being made. They will consider the nature, content and context of the allegation and agree on a course of action. If there is a conflict of interest in reporting the matter to the Head, it should be referred directly to the LADO. In the absence of the Head, the allegation should be reported to the Chair of Governors. Where there is an allegation against the Head, it should be reported to the Chair of Governors; in this case, the Head must not be informed of the allegation prior to contact with the Chair of Governors and the LADO. The school must not conduct any investigation about an allegation before referral to the LADO and, in the most serious cases, the police, so as not to jeopardise statutory investigations. Where an allegation relates to a member of the supply staff provided by an agency, the agency must be fully informed and involved.

Allegations against a member of staff who is no longer at the school and historical (non-recent) allegations of abuse should be referred to the police and the LADO.

The Foundation recognises a duty of care towards its employees and suspension is not the automatic default option in the case of an allegation. If suspension is deemed appropriate, the reasons and justification will be recorded by the school and the individual will be notified of the reasons, usually within one working day. The individual facing an allegation will be given appropriate support. While all relevant parties, such as the LADO and the parents of the pupil(s) involved, will be kept informed of developments, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The school will keep on the file of the person concerned a clear and comprehensive summary of the allegation; details of how the allegation was followed up and resolved; a note of any action taken, decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded; a copy of information provided to the person concerned, where agreed by Social Care Direct or the police; and a declaration of whether the information will be referred to in any future reference.

The school will report promptly to the DBS any person (whether employed, contracted or a volunteer) who has harmed or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier. A referral to the Teaching Regulation Agency (TRA) will also be considered where a teacher has been dismissed for misconduct, or would have been dismissed had he or she not resigned first. The reasons for such an order are: unacceptable professional conduct; conduct that may bring the profession into disrepute; or a conviction at any time for a relevant offence.

Details of an allegation will be recorded on the employee's file and retained until at least the employee reaches normal pension age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation is found to have been false, unsubstantiated or malicious, in which case it will be removed from the employee's records and will not be referred to in employer references.

Where an allegation by a pupil is shown to be deliberately false or malicious, the Head will consider whether to take disciplinary action in accordance with the school's Behaviour Policy.

All allegations and low-level concerns are reviewed and procedures scrutinised to allow lessons to be learned and actioned.

11. Low-level Concerns

Each school encourages everyone affected by its operation to report to the DSL (or Head) any concern – even if no more than one which causes a sense of unease of 'nagging doubt' – they may have that an adult working in or on behalf of the school may have acted in a way that is inconsistent with expected standards and/or the Staff Code of Conduct.

The purpose of this Low-level Concerns part of this policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

Low-level concerns may include (but are not limited to):
- where a low-level concern is raised about the Head, it should be reported to the Chair of Governors
- behaviour which is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- behaviour which doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority
- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include (but are not limited to):
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- using inappropriate sexualised, intimidating or offensive language.

All members of staff are encouraged to self-refer where, for example, they have found themselves in a situation which could be misinterpreted or might appear compromising to others, and/or on reflection they believe that they have behaved in a way that falls below the expected standards.

The DSL will share the concern with the Head and they will address it in a proportionate manner. They will gather as much evidence as they can by speaking where possible with the person who raised the concern, the individual involved and any witnesses. They will consider whether it is indeed a low-level concern or whether it is sufficiently serious to meet the harm threshold.

All low-level concerns will be recorded in writing by the Head or Deputy. The record will contain details of the concern, the context in which the concern arose, and action taken, together with the rationale for all decisions and actions. The name of the individual sharing the concern will also be noted: if the individual wishes to remain anonymous, that will be respected as far as reasonably possible. Low-level concerns are recorded in a confidential file.

Records of low-level concerns will be regularly reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern is identified, the Head and the DSL will decide on a course of action: this might be an internal disciplinary procedure or referral to the LADO if the harm threshold is met. They will consider if any wider cultural issues in the school enabled the behaviour to occur and if appropriate policies could be revised or extra training given to minimise the risk of recurrence.

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Those that relate exclusively to safeguarding will not be referred to in a reference unless they meet the threshold for referral to the LADO and are found to be substantiated.

Where a low-level concern relates to supply staff or a contractor, their employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

12. Out-of-hours contracts

As a Foundation we check that out-of-hours hire contracts for organisations working with children meet the expectations in the guidance for out-of-school settings. We ensure that incidents are recorded and if an allegation is received, relating to out-of-hours contracts, that the schools follow our safeguarding policy, including informing the LADO.

13. Training

The DSLs and DDSLs have undertaken child protection training, Prevent awareness training and training in inter-agency working, and will attend refresher training at two-yearly intervals. The DSLs will receive regular informal updates from the WSCP and all training will be carried out in accordance with WSCP guidance.

All new staff, including temporary staff and Governors, will be provided with induction training that includes:

- being provided with a copy of this policy, which includes the identity, contact details and role of the DSLs and DDSLs;
- the Staff Code of Conduct (including Whistleblowing, Acceptable Use of IT, Staff/Pupil Relationships, Low-Level Concerns Policy and Communication Guidance including use of Social Media);
- the Online Safety Policy;
- the Pupil Behaviour Policies;
- the school's safeguarding response to children missing from education;
- Part 1 and Annex B of KCSIE (September 2023); Governors and Heads may allow those who do not work directly with children to read only Annex A, which is a condensed version of Part 1.

All staff and Governors will receive a copy of this policy annually and Part 1 and Annex B (or, if appropriate, Annex A) of KCSIE (September 2023) and will be required to confirm that they have read and understood these. This is done by completing a Google form document acknowledging they have read, understood and follow these procedures.

All staff, including Governors, receive refresher training and safer working practice training every two years. In addition, staff will receive regular updates as required, and at least annually, in order to provide them with the relevant knowledge and skills to safeguard children effectively. This includes regular safeguarding training relevant to the age of the pupils in each school in addition to Prevent, Online-Safety and Child-on-Child abuse.

All staff are trained to manage a report of child-on-child sexual violence and sexual harrassment.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

14. **Oversight and Cross Foundation Liaison**

While safeguarding duties remain the responsibility of the governing body as a whole, the schools' have a 'board-level lead' nominated to take the lead in relation to responsibility for the safeguarding arrangements in the schools. These board level leads are Mrs Penny Plumpton and Mrs Fran Galbraith. All governors receive strategic governor safeguarding training.

Each safeguarding team within the Foundation meets regularly. The Foundation team, consisting of the DSLs and the designated safeguarding governors meets at least half-termly (often more regularly), with the wider safeguarding teams meeting termly. Whenever there are safeguarding concerns which are cross-foundation, all DSLs will share the required information. DSLs and safeguarding teams support one another as needs arise across the Foundation.

Governors receive a safeguarding report from the DSL team every term from each school in the Foundation.

At the Autumn Board the DSL team provides a Safeguarding Report that covers all 3 schools due to the fact we are a Foundation and governors are responsible for safeguarding in all schools.

The Foundation's Safeguarding Policies are reviewed annually by the governing body in association with the DSLs, with procedures and implementation updated as appropriate, so that they are kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. If an incident or new legislation or guidance necessitates an interim review, that will be undertaken. Any deficiencies or weaknesses in child protection arrangements will be remedied without delay. The Foundation's engagement with the WSCP includes taking part in the annual safeguarding audit and offer of training.

15. **Teaching children how to keep safe**

The Foundation ensures that all pupils are taught about safeguarding, including online, through the ICT curriculum and PSHE programme, to help children adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of the internet and the risks posed by people who use the internet to bully, groom, abuse or radicalise others, especially children and young people.

16. **Filtering and monitoring**

The schools all follow the guidance for [Filtering and Monitoring.](#) They all have appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Parents and carers are regularly updated with the programmes, systems and measures in place in school to safeguard the pupils. Further details of the schools' approach to online safety, including the use of 3G, 4G and 5G technology, can be found in the WGSF ICT Acceptable Use Policy which is published on the [WGSF website](#).

The Foundation has identified and assigned roles and responsibilities to manage filtering and monitor systems, reviews filtering and monitoring provision at least annually, blocks harmful and inappropriate content without this unreasonably impacting teaching and learning and has effective monitoring strategies in place that meet our safeguarding needs.

Termly reports are provided to the DSL by the ICT team and the filtering and monitoring is a standing item at DSL safeguarding meetings.

17. **Mental Health**

'Mental health is a state of well-being in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community.' (World Health Organisation)

Only appropriately trained professionals can diagnose mental health problems, but staff in school are well placed to identify behaviour that may suggest an issue. If staff have concerns about the mental health of a pupil, they will speak to relevant staff within the school including, if necessary, the DSL. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is suffering abuse. If a student presents with a medical emergency or if staff have a mental health concern about a pupil that is also a safeguarding concern, then immediate action will be taken. Where a CAMHS referral is necessary, then this is managed by the DSL.

The following policies are published on the website [WGSF Policies](#):

- WGHS Positive Mental Health Policy, RSHE Policy and PSHE Policy
- QEGS Positive Mental Health Policy, RSHE Policy and PSHE Policy
- WGPPS Positive Mental Health Policy, RSHE Policy and PSHE Policy

18. **Photography and Images**
To protect pupils, we will;

- seek pupils' consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- seek parental consent;
- not use a pupil's full name with an image;
- ensure pupils are appropriately dressed;
- ensure that personal data is not shared;
- store images appropriately, securely and for no longer than necessary;
- only use school equipment, i.e. not personal devices; and
- encourage pupils to tell us if they are worried about any photographs that are taken of them.

Appendix 1

The DSL's Role and Responsibilities

See also [Annex C of KCSIE](#).

The DSL is expected to:
- refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals to local authority children's social care;

- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to 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;

- refer cases where a crime may have been committed to the police as required;

- act as a source of support, advice and expertise for all staff;

- act as a point of contact with the safeguarding partners;

- liaise with the Head 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 LADO(s) for child protection concerns in cases which concern a staff member;

- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, mental health leads and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so the needs are considered holistically;

- liaise with the mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health;

- promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

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

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part 1 and Part 2 of KCSIE. When children leave the school (including in-year transfers) the DSL should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff, such as DSLs and SENDCOs or the named person with oversight for SEND in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

The DSL should:

- ensure each member of staff has access to, and understands, the school's Safeguarding and Child Protection Policy and procedures, especially new and part-time staff;
- ensure the school'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 regarding this;
- ensure the Safeguarding and 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 in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

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

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regard 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;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation, and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them;
- are aware of the role of the appropriate adult and PACE Code C requirements.

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

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

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

It is important that children feel heard and understood. Therefore, DSLs should be supported in developing knowledge and skills to:

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

The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

DSLs are the lead responsibility for filtering and monitoring and are responsible for ensuring that staff CPD is sufficiently focused and detailed in regard to filtering and monitoring, ensure the governing body understands their role in relation to this and can articulate a strategic plan which shows how the filtering and monitoring standards are implemented across the Foundation.

External counselling and support is available as needed. The wellbeing of DSLs is a governors' responsibility. DSLs meet regularly with the Board Leads and their wellbeing is a key agenda item at these meetings.

Appendix 2
Range of safeguarding issues

Staff are expected to be alert to the possibility of pupils experiencing safeguarding issues which are listed in Annex B of KCSIE.

Child Sexual Exploitation (CSE)

CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child (male or female) into sexual activity (a) in exchange for something the victim wants or needs, and/or (b) for the financial advantage or increased status of the perpetrator of facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can occur through the use of technology. CSE can affect 16- and 17-year-olds who can legally consent to have sex. It includes contact and non-contact sexual activity, e.g. copying images and posting on social media. This is a serious crime and is never the victim's fault even if there is some form of exchange. Staff will be careful to use appropriate language that does not victim blame.

Child Criminal Exploitation (CCE) and County Lines

As with sexual exploitation CCE is when there is a power imbalance where children are used by individuals or gangs to take part in criminal activity. This can include drug running, stealing, threatening other young people, etc. The child often believes they are in control of the situation. High levels of violence, coercion and intimidation are common. Staff will again be careful to not use language that blames the child.

'County lines' is a term used to describe gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It is a form of CCE as gangs use children and susceptible people to move and store drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local susceptible adults by force or coercion in a practice referred to as 'cuckooing'. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. The response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County Lines activity and the associated violence, drug-dealing and exploitation have a devastating impact on young people, vulnerable adults and local communities.

Domestic Abuse

This does not have to include violence to be classed as abuse. Any incident or pattern of incidents of controlling, psychological, physical, sexual, financial or emotional abuse (including 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. We are aware, as a Foundation, that domestic abuse may impact on children

through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. This Foundation is taking part in Operation Encompass, where we receive information, the next day, if police have been called out to a domestic abuse incident and any of our pupils were present. The purpose of this information sharing is to make the next day better for the child.

'Honour based' Abuse, including Female Genital Mutilation (FGM)

So-called 'Honour-based' abuse or violence (HBA/HBV) may include forced marriage, breast ironing and 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. A statutory duty is placed upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

Preventing Radicalisation

This is part of our wider safeguarding duty. We recognise that school plays a significant part in the prevention of this type of harm. We will include education through our PSHE/RSHE curriculum and promote 'British Values' and critical thinking.

We are aware extremism spans many topics. Extremism takes the form of vocal or active opposition to our fundamental values, including democracy, rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. In Wakefield, right wing extremism is most common.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. The internet has become a major factor in radicalisation and recruitment. We will intervene where possible to prevent susceptible children being radicalised.

Terrorism takes the form of an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. We will work with other partners including the Channel panel – a voluntary confidential support programme for those who are considered susceptible to being drawn into terrorism.

An 'incel' (*an abbreviation of 'involuntary celibate') is a member of an online subculture of people who define themselves as unable to find a romantic or sexual partner despite desiring one. Discussions in 'incel' forums are often characterised by resentment and hatred, misogyny, misanthropy, self-pity and self-loathing, racism, a sense of entitlement to sex, and the endorsement of violence against women and sexually active people.

As with all other forms of abuse, staff should be vigilant: they should be confident in identifying pupils at risk and act proportionately. The DSL team is appropriately trained and is able to offer advice, support and information to other staff.

The aspects covered in the preceding paragraphs are explained at greater length in Annex B of KCSIE.

Other issues covered in that Annex are: child abduction; community safety incidents; children and the court system; children with family members in prison; modern slavery and the national referral mechanism; and cybercrime.

Appendix 3 - Arrangements Specific to Wakefield Grammar Pre-Preparatory School (WGPPS)

Responsibilities for Early Years mobile phones and camera use

Personal mobiles and electronic devices:

All staff working directly with children in EYFS must ensure that their mobile phone and any other personal device is stored safely away from the children and is not used in the setting.

Dedicated EYFS mobile phone / camera or iPad:

To protect children we will ensure that the dedicated setting mobile phone / camera or iPad:

- is stored securely when not in use.
- is protected with a password, is clearly labelled, and its use is open to scrutiny. All staff are vigilant and alert to any potential misuse.
- is only used by authorised people who have a clear understanding of what constitutes misuse and know how to minimise the risk. These staff are responsible for their own behaviour regarding the use of the device.
- is not used in areas such as toilets.
- does not detract from the quality of supervision and care of children.

Mobile phones belonging to visitors:

We request that mobiles belonging to visitors are either switched off and/or stored securely in the staff room on entering the setting.

It is the responsibility of the EYFS lead (Mrs Michelle Robinson) to:

- Obtain parents' and carers' consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Ensure the setting's designated camera is only used in the setting.
- Ensure that children are appropriately dressed, and the child's name is not used with an image or a photograph
- Ensure that all images are stored securely and password protected
- Ensure that where professional photographers are used they follow our Safeguarding and Child Protection processes and a member of staff accompanies them at all times
- Ensure 'acceptable use' rules regarding the use of cameras by children are embedded in practice

All visitors must be under the supervision of a member of staff at all times and an appropriate risk assessment indicating this and who is responsible for the visitor.

Key workers

WGPPS follows the [statutory guidance for the EYFS](#) which states that every child should have a 'key person'. In FS1 each child is assigned to a teaching assistant, with overall responsibility sitting with the class teacher. In FS2, the class teacher is the key worker, supported by the teaching assistant. Their role is to help ensure that every child's care is tailored to meet their individual needs to help the child become familiar with the setting, offer a settled relationship for the child and build a relationship with their parents.

Staffing ratios

At WGPPS we ensure that staffing ratios always remain within the statutory guidance for EYFS which states' for children aged three and over in independent schools (including in nursery classes in academies), where there is no person with Qualified Teacher Status, Early Years Professional Status, Early Years Teacher Status or another approved level 6 qualification, no instructor, and no suitably qualified overseas trained teacher, working directly with the children:

- there must be at least one member of staff for every eight children
- at least one member of staff must hold an approved level 3 qualification
- at least half of all other staff must hold an approved level 2 qualification

However, we always try to ensure we staff well above these ratios, ensuring all of our classes have a teacher with Qualified Teacher Status and follow the [guidance](#).

For children aged three and over in registered early years provision where a person with Qualified Teacher Status, Early Years Professional Status, Early Years Teacher Status or another approved level 6 qualification, is working directly with the children:

• there must be at least one member of staff for every 13 children

• at least one other member of staff must hold an approved level 3 qualification

Note that all of our staff in EYFS hold an approved level 3 qualification.

Intimate Care

Within the WGPPS there may be times when administering intimate care is required. This occurs as outlined within the [WGPPS Pre-Prep intimate care policy](#) to support our children and ensure their privacy and independence is maintained as far as is practically possible.

Wakefield Grammar School Foundation

Allegation made by pupil against staff member.

Allegation should be made immediately to the headteacher (HT). In the HT's absence, or where the HT is the subject of the allegation, report to the Chair of Governors (COG) or Vice/Deputy Chair.

On the same day, the HT must inform the Local Authority Designated Officer (LADO) of all cases in which it is alleged the staff member has:
- behaved in a way that has harmed a child; or
- possibly committed a criminal offence; or
- behaved in a way that indicates they are unsuitable to work with children.

The LADO must discuss the allegation with the HT in order to:
- confirm details: what/who/where/when/witnesses?
- establish that the claim is not patently false;
- decide whether the child's parents are to be informed (to be decided immediately if medical treatment of the child is necessary);
- decide whether the accused is to be informed. The accused must be advised to contact their union or professional advisor at the outset;
- consider each of the 5 issues below.

Should staff member involved be suspended?

Suspension if:
- member of staff impedes an investigation;
- there is continuing risk of harm to a child which is lessened by suspension;
- allegations are so serious as to amount to possible grounds for dismissal;
- no other option is available.

Is the child suffering from or likely to suffer from 'significant harm'?

NO → No social care involvement.

YES → LADO will involve social care and immediately convene a strategy discussion involving the HT.

Is formal disciplinary action needed?

NO → LADO to discuss next steps with HT and HR. HT to institute appropriate action within 3 working days.

YES → Need to wait for social care or police to make further progress with investigation?

NO → Is further investigation required?

YES → Review

Is further investigation required?
- YES → LADO to discuss with HT and HR how and by whom an investigation should be undertaken. An independent investigator may be required in complex cases, otherwise a senior staff member will suffice.
  - Investigator's report to be ready within 10 working days.
  - LADO, HT and HR to decide whether a disciplinary hearing is necessary within 2 working days of receiving report.
  - Hearing should be held within a further 15 working days if all evidence is available.
- NO → HT to convene disciplinary hearing within 15 working days.

Might a criminal offence have been committed?

NO → No police involvement.

YES → LADO will immediately inform the police to conduct an initial evaluation to decide whether police investigation needed.

Is the allegation patently false?

LADO should refer the matter to children's social care – child might still be in need of services. If an allegation is shown to be deliberate or malicious, HT should consider appropriate action.

Police to set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service about future action. Review to take place within 4 weeks after the initial evaluation. Set dates for subsequent review.

Possible outcomes (police to pass all relevant information to school within 3 working days):

No charge | Caution | Proceed to prosecution

Decision has to be made in respect of employment issues.

Possible outcomes

Dismissal | Employee resigns before hearing. | Warning | Take no further action

Determine whether referral to ISA required. If so, report should be made within one month. Please see guidance.

In all cases, school must retain a detailed record of the case until the person reaches normal retirement age or for 10 years from the date of the allegation (whichever is the longer).