

# Child protection and safeguarding policy and procedures

## Contents

1. Aims .....	2
Staff are properly trained in recognising and reporting child protection and safeguarding issues	2
2. Legislation and statutory guidance .....	2
3. Definitions .....	3
4. Equality statement .....	3
5. Roles and responsibilities .....	3
6. Confidentiality .....	6
7. Recognising abuse and taking action .....	6
8. Notifying parents .....	13
9. Mobile phones and cameras .....	13
10. Complaints and concerns about School safeguarding practices .....	13
12. Training .....	14
13. Monitoring arrangements .....	15
14. Links with other policies .....	15
Appendix 1: Designated Safeguarding Leads .....	16
Appendix 2: Types of abuse .....	17
Appendix 3: Safer recruitment and DBS checks – policy and procedures .....	18
Appendix 4: Allegations of abuse made against staff .....	21
Appendix 5: Specific safeguarding issues .....	25
Appendix 6: Responding to concerns that a child may be abused or neglected .....	30

## 1. Aims

Ambitious about Autism aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding and are properly trained in recognising and reporting child protection and safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local multi-agency partnerships, including adhering to the Pan London Child Protection Procedures and Guidance (5th edition) which can be found on the [London Child Protection Procedures website](#).

This policy is also based on the following legislation:

Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on Non-Maintained Special Schools (NMSS) to safeguard and promote the welfare of pupils at the school

- [The Children Acts 1989](#) and [2004](#), which provide a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers and other professionals to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by or at risk of FGM
- Sexual Offences Act 2003, Serious Crime Act 2015 and Voyeurism Act 2019 which among other things, provide the framework for responding to allegations of sexual violence and harassment between pupils in schools and colleges
- [The Rehabilitation of Offenders Act 1974 \(exceptions order 1975\)](#), which outlines when people with criminal convictions should disclose these to prospective employers
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012](#), which define what 'regulated activity' is in relation to children and vulnerable adults
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Disqualification under the [Childcare Act \(DUCA\) Regulations 2018](#), which sets out who is disqualified from working in early years or later years childcare

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

This policy also complies with our funding agreement and articles of association.

This policy also complies with Charity Commission guidance in [Safeguarding duties for charity trustees](#) and [Safeguarding strategy](#) and how to report serious safeguarding incidents [Guidance on reporting serious incidents](#)

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment.
- Preventing impairment of children’s mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**Children** includes everyone under the age of 18. The term Children in this policy could also be referenced as Young People. For Young People in our services over the age of 18 please refer to our Adult Safeguarding Policy.

OFSTED defines safeguarding as:

*“Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:*

- *children’s and learners’ health and safety and well-being, including their mental health*
- *meeting the needs of children who have special educational needs and/or disabilities*
- *the use of reasonable force*
- *meeting the needs of children and learners with medical conditions*
- *providing first aid*
- *educational visits*
- *intimate care and emotional well-being*
- *online safety and associated issues*
- *appropriate arrangements to ensure children’s and learners’ security, taking into account the local context*

### 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. Children with autism may be more vulnerable to abuse than their neurotypical peers due to their autism. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.

### 5. Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. As an organisation we promote a whole organisational approach to safeguarding. This policy applies to all staff, trustees, volunteers

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

and governors in the School and is consistent with the procedures of Haringey Safeguarding Children's Partnership.

We are aware of our responsibility to do all we can to support social workers, and to facilitate social workers to have access to children in order to undertake statutory assessments under s17 (child in need) or s47 (child in need of protection). Any staff member may be asked to contribute to an assessment and would have a statutory responsibility to do so.

Our policy and procedures also apply to extended School and off-site activities, such as community access programmes, residential visits and work experience placements.

### 5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. The organisation has a process to track that staff have read and understood the statutory safeguarding guidance.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of and how to contact the designated safeguarding lead (DSL), online safety and acceptable use policy, the behaviour policy, and the safeguarding response to children who go missing from education.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to Local Authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as the different forms of exploitation (including criminal and sexual exploitation), honour based abuse and radicalisation. The organisation has a separate Preventing Extremism and Radicalisation Policy.

Section 12 and Appendix 5 of this policy outline in more detail how staff are supported to do this.

### 5.2 The designated safeguarding lead (DSL)

Our DSLs are The Assistant Head (PDWB) of TreeHouse School and the Head of School. The Director of External Affairs is the DSL for central charity staff. The DSL takes lead responsibility for child protection and wider safeguarding arrangements.

The Executive Principal is the Organisation Lead and has overall responsibility for safeguarding. In the absence of the Executive Principal the role will be delegated to another trained member of the Executive Leadership Team.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. See Appendix 1 for a full chart of DSLs and Deputy DSLs.

When the DSL is absent, the Head of School will deputise for the DSL.

If the DSL and Head of School are not available, the Executive Principal will act as cover (for example, during out-of-hours/out-of-term activities). The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

- Refer suspected cases, as appropriate, to the relevant body (Local Authority children's social care, Channel programme, and/or police), and support staff who make such referrals directly.
- Be aware of, and follow, the NPCC guidance on [when to make a direct referral to the police](#)
- Where learners have an allocated social worker as a result of concerns about abuse or neglect, ensure relevant staff are aware of this so that additional learning and/or pastoral support can be offered to the child.
- Liaise with the School's mental health lead
- Liaise with HR to ensure appropriate referrals are made to the Disclosure & Barring Service, Teaching Regulation Agency and / or other regulatory bodies

The DSL will also keep the Organisational Lead informed of any issues and liaise with Local Authority case managers and designated officers for child protection concerns as appropriate. The Organisational Lead in turn will brief and keep updated the Chief Executive and/or Chair of Trustees as appropriate.

The full responsibilities of the DSL are set out in their job description and at KCSIE annex B.

### 5.3 Governance

The Education Committee will approve this policy at each review and hold the Executive Principal and Head of School to account for its implementation.

The Board of Trustees will appoint a senior board level member to monitor the effectiveness of this policy in conjunction with the board of Ambitious about Autism/ Autism Schools Trust. This is always a different person from the DSL. In addition, there is a joint Safeguarding Board which meets three times each year to review and monitor child protection and safeguarding practice across the organisation. The Safeguarding Board reports to the Education Committee.

The Executive Principal will act as the 'case manager' if an allegation of abuse is made against a Head of Service.

The Chief Executive will act as the 'case manager' if an allegation of abuse is made against the Executive Principal.

The Board lead will act as the 'case manager' if an allegation of abuse is made against the Chief Executive Officer.

Trustees must also follow the specific guidance outlined in *How to report serious incidents in your charity* Sept 2107, *Charities: how to protect children and adults at risk 2018* and *Strategy for dealing with Safeguarding issues in charities* Charity Commission Sept 2017.

The Chief Executive will advise the Chair of Trustees when a safeguarding incident needs to be reported to the Charity Commission.

### 5.4 The Executive Principal

The Executive Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- Communicating this policy to parents when their child joins the School and via the School website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 4).
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## 6. Confidentiality

In TreeHouse School the DSL has responsibility to ensure all concerns within the School are recorded, monitored and secured.

The Director of External Affairs is responsible for concerns that are not about pupils/learners at the school or college to be recorded, monitored and secured.

Our settings use a digital recording system, BehaviourWatch, which includes a discrete child protection module with appropriate security certificates in place. All staff are expected to record their concerns onto BehaviourWatch; these records are accessible only to the designated staff and Head of School and Executive Principal

All existing paper records are kept in a locked cabinet and in a secure place within the main School building.

Records will not be taken off the site without the express written permission of the Executive Principal.

Access to these records (whether paper or digital) will be strictly limited on a need to know basis and controlled by the DSL and the Organisational Lead and the Chief Executive. Where someone other than the Designated staff, Head of School, Exec Principal has reason to view a child's child protection file, this will be recorded on the child's chronology.

All electronic records will be held in a secure area with access limited by the DSL. If records are sent outside of the organisation then the records would be password protected and/or sent via an encrypted email system such as Egress Switch.

## 7. Recognising abuse and taking action

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

Procedures cannot predict every set of circumstances and if any member of staff/volunteer is dealing with a child protection or safeguarding matter, then they should raise concerns without delay, seek support through supervision and debrief with a senior manager at each stage in the process.

### 7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The procedures detailed here are mandatory and must be followed. The flow charts that accompany these procedures constitute the basic outline of the processes that need to be considered; each box on the flow chart has a related paragraph in these procedures.

### Responding to concerns that a child may be being abused or neglected, including disclosure by a child or young person

Discuss your concern or the incident / disclosure with the DSL or deputy without delay; you will then be asked to record your concern or the incident on BehaviourWatch as soon as possible.

Also refer to flow chart Figure 1.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## Recognition of signs and indicators of abuse

Recognition of the signs and indicators of abuse poses considerable challenges for most professional staff who work with children and do not deal with protection and safeguarding issue on a day to day basis. Identifying abuse of children with disabilities who may also present with a range of behaviors that challenge is not straightforward. It is crucial to effective safeguarding that all staff and volunteers are able to recognise signs and indicators of abuse and this requires acceptance that children with autism are more likely to be abused than children without disabilities.

Appendix 2 offers a range of indicators and signs of abuse as well as examining some of the potential blocks to recognition and factors which can inhibit the taking of appropriate steps.

### Raising a concern

Where a member of staff believes a child may be at immediate risk of abuse or neglect, or a child or young person makes a disclosure, staff will report this directly and without delay to the Designated Safeguarding Lead (DSL). In TreeHouse School, this is the Assistant Head of School, Head of School, and in their absence it falls to the Exec Principal.

If no Designated person is available, or the concerns are not within the School then the Executive Principal should be reported to directly. The staff member with the concern will then be asked to make a detailed record of the information on BehaviourWatch.

Where staff have a safeguarding or pastoral concern or believe that a child may benefit from early help (but do not believe there is an immediate risk of harm) they will make a detailed written account of their concern or the incident on BehaviourWatch. The DSL or deputy may contact the member of staff for additional information or clarification.

### Recording

The keeping of accurate and prompt recording is fundamental to effective safeguarding and all staff and volunteers have a responsibility to ensure all concerns are recorded appropriately. This requires those who raise concerns to make a written record on BehaviourWatch within **two hours of raising any concerns**. If more than one member of staff is present at an incident, each should make their own record.

The child protection facility of BehaviourWatch is designed to capture the essential information outlined below. If for some reason, an individual cannot make a digital record (a visiting professional, for example) they will be asked to make a written record instead which should include;

- Who they have concerns about (name of pupil).
- Age of pupil (if known).
- Date and time, they are making the record.
- Date and time the incident occurred (if this is known).
- What was observed, heard or noted that led to the concern being raised.
- Source of information (if the concern was not directly observed i.e. a parent informs a member of staff that he/ she has seen abuse indicators).
- Behavioural observations (noting that this is one of the most likely ways in which a member of staff is likely to note concerns).
- If a child or young person has made a disclosure, record what was said / communicated.
- Which senior manager within Ambitious about Autism/Ambitious about Autism School Trust has been reported to (in line with these procedures) and what initial actions were agreed.
- This record must be signed and time dated by the person making the record and the relevant DSL.

The DSL will ensure that the concern or incident is logged on BehaviourWatch and the paper record is scanned into the system.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

When reporting a concern to the local authority children's social care, the DSL will inform the Local Authority that a written record of the concern is available and will email details of the concerns to the local authority securely if requested.

If at any stage we or the Local Authority decide that no further action is to be taken, then the reason for this and who made the decision will be recorded.

Once a concern has been raised about a child, an individual child protection record will be created on BehaviourWatch. All subsequent actions/events following the reporting of a concern should be recorded in the digital file; which will then produce a chronology. Any documentation received digitally from the local authority, police or other agencies will be saved to the digital child protection file; paper documentation will be scanned in and the date of receipt logged.

### **Concerns that a child has been harmed or is at risk of harm by a stranger or member of the public**

If initial fact finding suggests that the concerns relate to a member of the public or a stranger, then the DSL, Head of School, Director of External Affairs or Executive Principal should report the matter to children's social care and the police without delay.

Some Local Authorities in London indicate they will contact the police in such circumstances. It is essential that the police are informed so this needs to be clarified at the time of raising the concern. The DSL or deputy will take into account the [NPCC guidance](#) on when to contact the police. In such circumstances the police lead investigations and may need to interview staff or volunteers as witnesses. With the agreement of children's social care, the DSL or deputy should inform the parents/carers of the child of the concerns.

<https://www.gov.uk/report-child-abuse-to-local-council>

### **7.2 If a child makes a disclosure to you**

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions; use TED (Tell, Explain, Describe) questions if you need to clarify what the child is telling you.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Contact the DSL or deputy without delay; disclosures will almost always require referral to children's social care
- Record your conversation on BehaviourWatch as soon as possible using the child's own words.
- If you made any initial notes before uploading the report to BehaviourWatch you must also sign and date the note and pass it on to the DSL.
- Remember that records of concerns, disclosures, initial notes, etc., may be shared with children's social care, police or as part of legal action; it is therefore essential that you stick to the facts, and do not put your own values or judgement on the situation
- If the child is at immediate risk, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

Remember that disclosure does not have to be verbal; a child may sign or communicate their worries or concerns non-verbally.

### **7.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

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

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0



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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 5.

**Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless there is a good reason not to, the member of staff should inform the DSL that a police report has been made, and make a record on BehaviourWatch

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

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and then make a record on BehaviourWatch.

**Any member of staff** who suspects a pupil is *at risk* of FGM or discovers that a **pupil age 18 or over** appears to have been a victim of FGM, must speak to the DSL and record their concern on BehaviourWatch.

#### **7.4 If you have concerns about a child (as opposed to a child being in immediate danger)**

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, if the locally agreed criteria for action have been met, make a referral to Local Authority children's social care directly (see 'Referral' below) taking into account whether or not parental consent would be needed.

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

#### **Early help**

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency early help assessment as appropriate.

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

#### **Referral**

If it is appropriate to refer the case to Local Authority children's social care or the police because the local criteria for action have been met, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the Local Authority and if necessary, follow the multi-agency partnership escalation procedure to press for reconsideration to ensure the concerns have been addressed and the child's situation improves.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## 7.5 If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to the relevant agencies directly if appropriate (see 'Referral' above). The organisation has a separate Preventing Extremism and Radicalisation Policy.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the Prevent coordinator, [Channel](#), a programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority children's social care team.

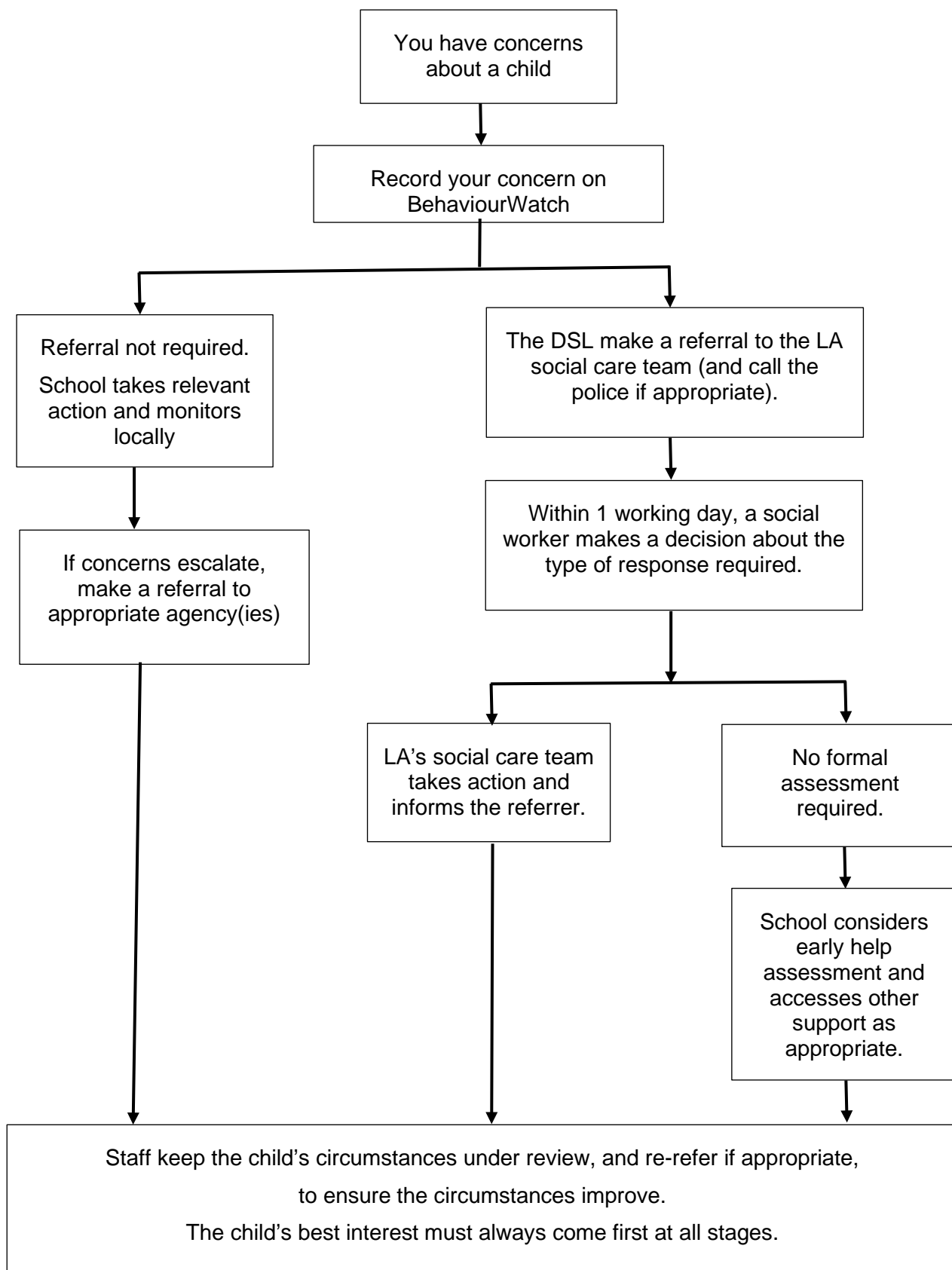
The Department for Education also has a website, Educate against Hate (<https://educateagainsthate.com/>) and a dedicated telephone helpline (020 7340 7264) that School staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

**Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)**



**Further information can be found in Appendix 6.**

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## 7.6 Concerns about a staff member (including agency staff) or volunteer

- If you have concerns about a member of staff or volunteer, speak to the DSL
- If you have concerns about the DSL, speak to the Head of School
- If you have concerns about the Head of School speak to the Executive Principal.
- If you have concerns about the Executive Principal speak to the Chief Executive (CEO).
- If you have concerns about the CEO speak to the Chair of Trustees.

You can also discuss any concerns about any staff member, agency / supply person or volunteer with the DSL.

The Head of School will then follow the procedures set out in Appendix 4, if appropriate.

Where the threshold is met, the School DSL will inform the Local Authority Designated Officer (LADO) within 24 hours. If the concern or incident relates to an agency or supply person, the agency will also be informed.

Where appropriate, the School will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 4 for more detail).

## 7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Most cases of pupils intentionally harming other pupils will be dealt with under our behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious and/or potentially a criminal offence.
- Where the harm to the victim meets the local criteria for action (s47)
- Could put pupils in the School at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting and upskirting).

If a pupil/learner makes an allegation of abuse against another pupil/learner:

- You must tell the DSL and record the allegation on BehaviourWatch, but do not investigate it.
- Record what is known, observed and / or said / communicated, rather than your views or opinion
- If the allegation or incident meets local criteria for action, the DSL will contact the Local Authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk and needs assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

- Ensuring our curriculum helps to educate pupils about appropriate behaviour, healthy relationships, safe touch and consent.
- Ensuring pupils know they can talk to staff in confidence. Pupils/Learners are encouraged to talk to the staff members with whom they have a good rapport with or their teacher.
- Ensuring staff are trained to understand that a pupil/learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Further information about peer on peer / child on child abuse, including sexual violence and harassment between pupils in schools and colleges, can be found in Keeping children safe in education part 5.

## 8. Notifying parents

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

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

Consent from parents will always be needed for s17 child in need support or early help but is not required in order to make a s47 (child protection) referral. In line with the principles of GDPR and the Data Protection Act 2018, if we believe that notifying the parents would increase the risk to the child, allow evidence to be destroyed, or that it would not be reasonable or practical to contact parents (for example, because it would cause a delay or the given phone number is uncontactable) we will discuss this with the Local Authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. If the police or children's social care are involved, the parents will only be informed with the agreement of those agencies.

## 9. Mobile phones and cameras

Staff are allowed to bring their personal phones to School for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags, lockers or cupboards during contact time with pupils; this is a statutory requirement for staff working in the EYFS.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation (GDPR) and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

For further guidance please see the e-safety policy.

## 10. Complaints and concerns about School safeguarding practices

### 10.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 4).

### 10.2 Other complaints

Concerns raised against the organisation in relation to its handling of safeguarding issues should be referred to the CEO who will raise this with the Chair of Trustees where appropriate.

### 10.3 Whistle-blowing

For information on Whistleblowing, please see the Ambitious about Autism Whistleblowing policy.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## 11. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Child protection and safeguarding records relating to individual children will be retained according to statutory guidance after they have left the School (if AaA is the last education setting a child attends) in accordance with the Ambitious about Autism Retention of Records Policy.

All paper records will be kept in a locked cabinet and in a secure place within the main School. Paper records will not be taken off the site without the express written permission of the Executive Principal. Access to paper and digital child protection records will be strictly limited on a need to know basis and controlled by the DSL, Executive Principal and the Chief Executive.

Electronic records relating to safeguarding concerns, including emails and reports, will be saved to the child's digital child protection file

Child protection records will be kept separately from education files/records. If a child transfers to another setting, the School will provide the new setting with the child protection file as soon as possible, ideally in a face to face handover. If this is not possible, the file will be sent securely and separately from the main pupil file and taking into consideration the Data Protection Act 2018 and GDPR. The DSL is responsible to make sure that a child's protection file and other information is transferred as soon as possible and to ensure safe transit, confirmation of receipt should be obtained, and the receiving SENCO and DSL notified the file has been sent. If it is in the best interest of the child information can be shared in advance of transferring the file in order to allow the new setting to plan any support the child may need. AaA / AaAST will retain a copy of the chronology in line with the retention schedule (see above).

Parents and carers with parental responsibility have a right of access, should they request it, to all records that our schools and college make about a child (but not child protection files or those records and reports sent to the charity from other agencies). Therefore, anyone recording safeguarding issues should consider this and ensure that records are factual, clear and, where opinion is expressed, it should be recorded as such and distinguished from fact.

In addition:

- Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 12. Training

### 12.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand our safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect or safeguarding issues. This training will be regularly updated and will be in line with advice from our local safeguarding children partnership.

All staff will have training on the government's anti-radicalisation strategy, PREVENT, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

Agency / supply staff will be provided with an induction programme which is proportionate to the amount of time they will spend at the School; for short (one or two days, for example) contracts, agency staff will be provided with written information on our procedures and how to contact the DSL or deputy while medium to long term placements will have a more detailed programme.

Volunteers will receive appropriate training, if applicable.

### **12.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake PREVENT awareness training at least every 3 years.

### **12.3 Governors**

All Trustees and Governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their strategic responsibilities as outlined in KCSIE part 2.

### **12.4 Recruitment – interview/appointment panels**

At least one person on any interview/appointment panel for a post at the School will have undertaken Safer Recruitment in Education training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education part 3, and be in line with local safeguarding procedures.

### **12.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## **13. Monitoring arrangements**

This policy will be reviewed **annually** by the Executive Principal and the Education Committee. At every review, it will be approved by the full Education Committee and will be provided to the Governing Body for information.

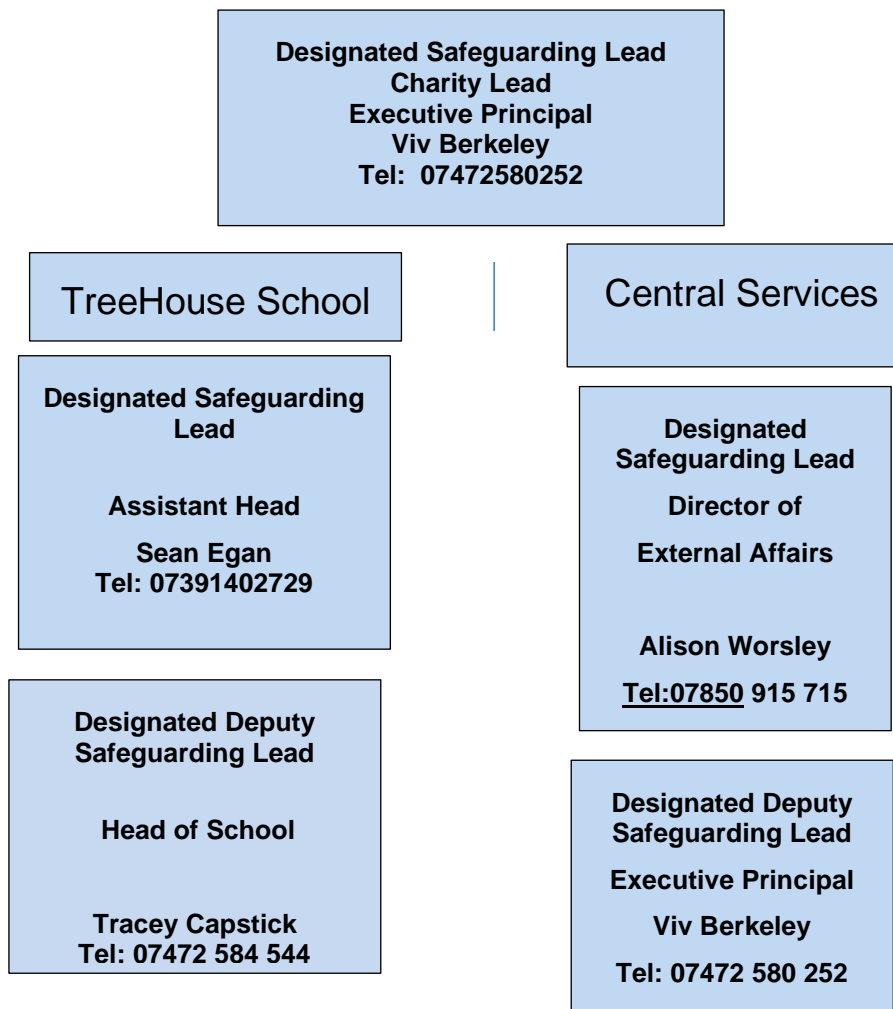
## **14. Links with other policies**

This policy links to the following policies and procedures:

- Physical Intervention Policy
- Staff code of conduct
- Compliments and Complaints Policy
- Health and Safety Policy
- Attendance Policy
- Pupil Behaviour policy
- Mental health & wellbeing policy
- Online safety
- Relationships and sex education and PSHE curriculum
- First aid
- Curriculum
- Privacy notices
- Whistleblowing Policy
- Preventing Extremism and Radicalisation.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## Appendix 1: Designated Safeguarding Leads



Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0



**These appendices are based on the Department for Education’s statutory guidance, *Working together to safeguard children 2018* and *Keeping Children Safe in Education 2020*.**

## **Appendix 2: Types of abuse**

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**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 adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.
- 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.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**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.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**Neglect** 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).
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

### Appendix 3: Safer recruitment and DBS checks – policy and procedures

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

#### Appointing new staff

When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). Where it is necessary to make a copy of the original certificate, we will not keep the copy for longer than 6 months.
- Obtain a separate barred list check if they will start work in regulated activity with children before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be in teaching work.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.

Wherever possible, we will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

We will ensure that appropriate steps are carried out to ensure that individuals employed to provide early years or later years childcare confirm that they are not disqualified from providing that care under the Disqualification under the Childcare Act (DUCA) Regulations 2018.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not have a lawful reason to carry out certain checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity with children** includes any person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not
- Driving a vehicle purely to convey children
- Providing health care to children
- Anyone who line manages others who are in regulated activity

**Regulated activity with adults** includes any person who will be:

- Providing healthcare
- Providing personal care
- Providing social work
- Giving assistance with general household matters
- Assisting someone to manage their personal affairs (e.g. their finances)

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

- Conveying a person to or from a setting where they receive health or social care

Regulated activity with adults does not need to happen regularly; it is regulated the first time it occurs. Teaching learners over the age of 18 is not regulated activity unless its purpose is to teach individuals how to provide their own health or personal care, or manage their own finances, etc.

### Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We have a statutory duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant).
- Where the individual has received a caution or conviction for a relevant offence.
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#).
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made. We will provide each agency with a written statement of our procedures for managing allegations against staff, making clear that:

- If an allegation or concern relates to an agency / supply member of staff, the School will make a referral to the LADO;
- The School will also notify the agency;
- If an investigation is required, the School will undertake this unless advised differently by the LADO;
- The School will expect the agency to share any information relevant to the investigation.

### Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the School has had the appropriate level of DBS check. This will be:

- An enhanced DBS certificate with barred list information for contractors engaging in regulated activity.
- An enhanced DBS certificate, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.
- We will obtain the DBS certificate at the appropriate level (standard or enhanced) for self-employed contractors who are sole traders, if they are eligible for such a check.

Where there is a need to make a copy of the sole trader's DBS certificate, we will not keep the copy for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the School.

### Trainee/student teachers

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

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

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

## **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS certificate with barred list information for all volunteers who are new to working in regulated activity.
- Undertake a written risk assessment for all new volunteers not working in regulated activity, to determine whether any level of criminal check is relevant and proportionate.
- Where the risk assessment indicates that this is appropriate, obtain an enhanced DBS certificate without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, regular supervised volunteers.
- Ensure that volunteers providing early years or later years childcare are made aware of their duty to disclose if they have reason to believe that they may be disqualified from providing childcare under the Disqualification under the Childcare Act (DUCA) Regulations 2018.

## **Governors**

All trustees and local governors will have an enhanced DBS certificate (without barred list information) and section 128 check [*section 128 checks are only required for local governors if they have been delegated any management responsibilities*].

They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board of trustees will have their DBS check countersigned by the Secretary of State.

All trustees, proprietors and local governors will also have the following checks:

- Other checks deemed necessary if they have lived or worked outside the UK

Trustees are also required to complete a self-disclosure of their suitability to act as a fit and proper person (see Charity Commission website for more information)

## **Adults who supervise pupils/learners on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Pupils staying with host families**

Where the School makes arrangements for pupils/learners to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the School is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## Appendix 4: Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, agency / supply staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved in a way that indicates they may be unsuitable to work with children

It applies regardless of whether the alleged abuse or behaviour took place in the School. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children/learner
- Redeploying the individual to alternative work in the School so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.

### Definitions for outcomes of allegation investigations

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

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

### Procedure for dealing with allegations

In the event of an allegation that meets or appears to meet the criteria above, the Headteacher/Executive Principal (or Chair of Governors where the Headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the Local Authority (the LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the School is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in School and/or liaise with the police and/or children’s social care services as appropriate:
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative from the senior team to keep them informed of the progress of the case and consider what other support is appropriate. Staff can contact WorkPlace Options Tel [0800234458](tel:0800234458) [assistance@workplaceoptions.com](mailto:assistance@workplaceoptions.com) [www.workplaceoptions.com](http://www.workplaceoptions.com)
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where the individual facing the allegation or concern has been removed from regulated activity and it is believed that they have engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person working with children in the EYFS (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency (TRA).
- Where the police are involved, wherever possible Ambitious about Autism/Ambitious about Autism Schools Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the School’s disciplinary process, should this be required at a later point. The same will be requested where children’s social care are undertaking s47 enquiries.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

If a disciplinary hearing is required and can be held without further investigation, we would usually hold this within 15 working days.

## Specific actions

### Allegations or concerns relating to agency / supply staff

Where an allegation or concern relates to an agency / third party worker, the School will make a referral to the LADO and also notify the agency / employer. In line with Keeping children safe in education part 4:

- If an investigation is required, the School will undertake this unless advised differently by the LADO;
- The School will expect the agency to share any information relevant to the investigation.
- We will provide each agency with a written statement of our procedures for managing allegations against staff.

### Action following a criminal investigation or prosecution

The case manager will discuss with the Local Authority designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and Ambitious about Autism's HR advisor will discuss with the designated officer and referrals would be made to DBS when the organisation believes a person has caused harm or poses a future risk of harm to vulnerable groups, including children.'

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching. A referral would be appropriate if the alleged misconduct is so serious that it warrants a decision on whether the teacher should be prevented from teaching.

### Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the School.

### Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Headteacher, or other appropriate person in the case of an allegation against the Headteacher, will consider whether any disciplinary action is appropriate against the pupil(s)/learner(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil or learner.

### Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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

- Who needs to know about the allegation and what information can be shared.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the School will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will normally retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. However, for the duration of the Independent Inquiry into Child Sexual Abuse (IICSA) it is unlawful to destroy any records that may be called as evidence to the inquiry; as a result, the records relating to any allegation of sexual harm of a child or children will be retained for the duration of the inquiry, regardless of the outcome.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file, unless they fall within the scope of the IICSA as described above.

### **References**

When providing employer references, we will not refer to any allegation that has been recorded as false, unfounded, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unfounded, unsubstantiated or malicious.

### **Learning lessons**

At the conclusion of any case we will review the circumstances of the case with the local authority designated officer to determine whether there are any improvements that we can make to the School's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual
- Whether there are any training needs or changes to policies / procedures needed

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0



## Appendix 5: Specific safeguarding issues

### Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the Local Authority if a child leaves the School without a new School/College being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

### Child sexual exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL and report their concern on the digital system. The DSL will follow the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if the local thresholds / criteria for action have been met. Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older or more competent boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education.

### **Child criminal exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial 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. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see KCSIE annex A for more information), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

### **Domestic abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. More information on domestic abuse and Operation Encompass can be found in KCSIE annex A.

### **Honour based abuse, including FGM**

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
  - A mother/family member disclosing that FGM has been carried out
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing Physical Education (PE)
  - Being repeatedly absent from School, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other forms of honour based abuse

Having a mother, older sibling or cousin who has undergone FGM

Having limited level of integration within UK society

Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period

Arrangements being made for a 'party' involving only female members of the family or community

Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

Being unexpectedly absent from School

Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Other forms of honour based abuse include breast ironing, whereby a girl's breasts are regularly beaten with hot stones, paddles or similar in an attempt to prevent the breasts from developing. It also includes the tight binding of a girl's chest to prevent breast growth.

### **Forced marriage**

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

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

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

The DSL will:

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

### **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools/Colleges have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Further information on the School's measures to prevent radicalisation are set out in other school policies and procedures, including

- Curriculum policy
- Behaviour policy
- Online safety policy
- Preventing Extremism and Radicalisation Policy
- Fundamental British Values curriculum and PSHE / RSE policies

### Children's mental health

All children can experience mental health issues and / or low mood although this can be particularly difficult to identify in a child with Autism. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one; in most cases, this information should be shared with the relevant lead staff member in line with the AaA/ AaAST 'mental health & wellbeing' policy.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this child protection policy and speaking to the designated safeguarding lead or a deputy.

### **Other safeguarding issues**

Keeping children safe in education annex A includes additional information on other circumstances that can have a serious impact on children's safety and wellbeing, e.g., homelessness, having a relative in prison, children missing from education, abuse linked to a belief in spirit possession, faith abuse, and children in the court system. At Treehouse School, we recognise that children with Autism and their families may be more vulnerable to some of these safeguarding risks.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

Visitors are expected to sign in using the automated system and wear a visitor's badge.

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

### **Non-collection of children**

If a child is not collected at the end of the session/day, we will:

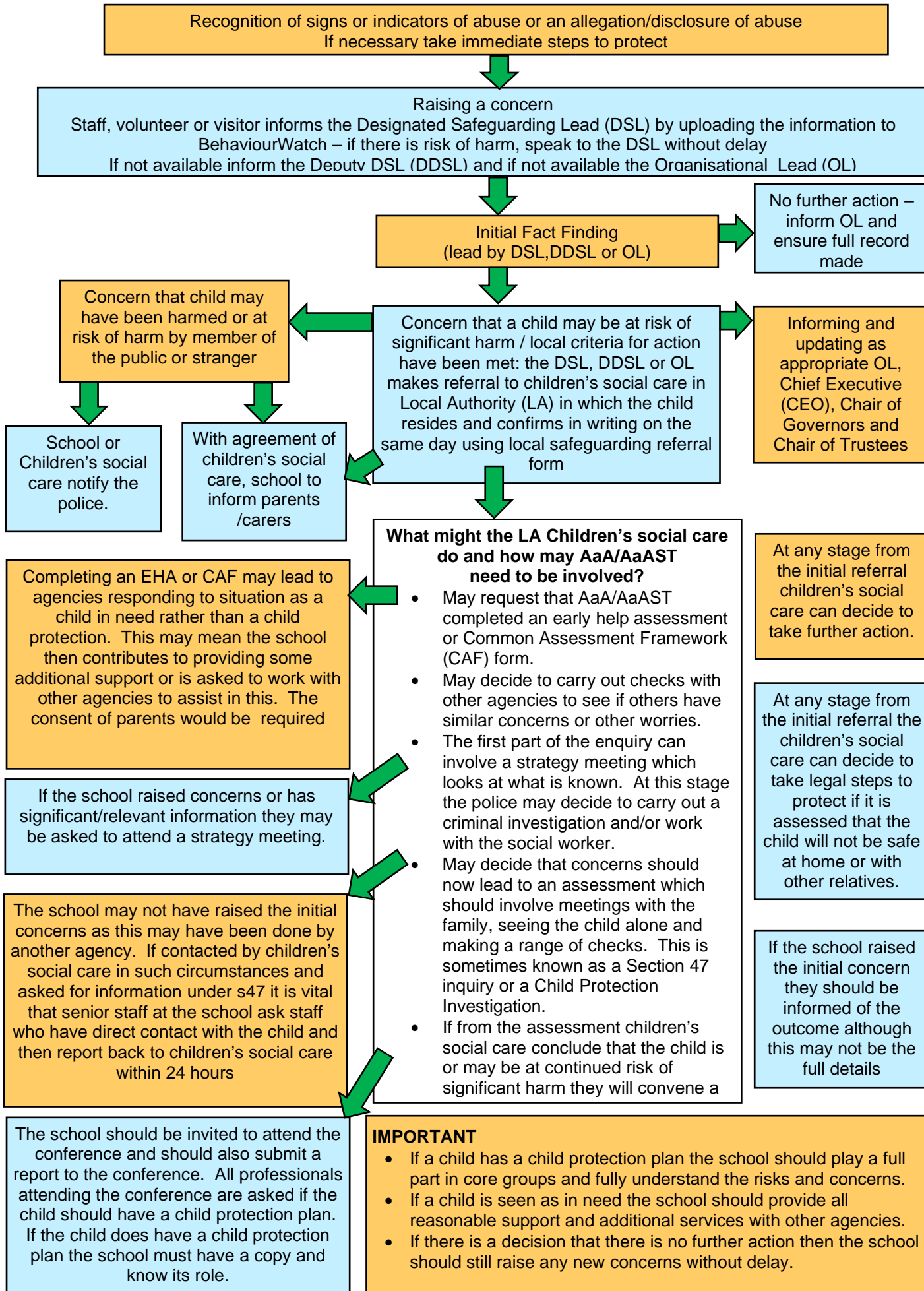
- Ring the main contact to inform them transport has not collected their son/daughter.
- If appropriate inform the Local Authority.
- Ask for the child to be collected by the parent during this time with a member of staff who knows the child will wait with them.
- If the parent cannot collect the child the School will organise for the child to be escorted home in a taxi or a company vehicle.
- If the non-collection of a child is considered a safeguarding concern then this would be reported as a concern to the DSL.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing from School we will invoke the School's absconding policy and procedure.

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## Appendix 6: Responding to concerns that a child may be abused or neglected



Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0

## Appendix 7 – Key contact details in host London Boroughs

Haringey Local Authority Safeguarding Information:

- [Haringey's Child Protection Website](#)
- [Haringey's Safeguarding Adults Website](#)
- [The MASH operating protocol](#)

The Haringey Local Authority Designated Officer (LADO) is Sarah Roberts. She can be contacted on 020 8489 2968/1186 or email [LADO@haringey.gov.uk](mailto:LADO@haringey.gov.uk).

Policy Owner	Executive Principal	Review Date:	November 2021
Policy No.	002b	Version No.	T1 1.0