



<b>Policy Document:</b>	SAFEGUARDING POLICY
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**Safeguarding Governor Signature:**

A handwritten signature in black ink, appearing to be 'NA' or similar initials, written in a cursive style.

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Reporting Female Genital Mutilation: t. 101

Non Emergency Police: t. 101

DfE Helpline for Counter Extremism: t. 020 7340 7264 e. [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

Local Authority Prevent Lead: Joanna Fitzsimmons 07515 332702

[joanna.fitzsimmons@liverpool.gov.uk](mailto:joanna.fitzsimmons@liverpool.gov.uk)

Merseyside Police Prevent Team - 0151 777 8506, Det Sgt Paul Storey 0151-777-8328

E-mail: [MSOC.Special.Branch@Merseyside.pnn.police.uk](mailto:MSOC.Special.Branch@Merseyside.pnn.police.uk)

Forced Marriage Unit: t. 020 7008 0151 or e. [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

Operation Encompass: t. 0204 513 9990

Liverpool Careline: t. 0151 233 3700

Alder Hey Hospital: t. 0151 228 4811

National Domestic Abuse Helpline: t. 0808 2000 247

NSPCC Whistleblowing Helpline: t. 0800 028 0285 e. [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

# Safeguarding Policy

## 1. Introduction

***This policy provides guidance to all adults working within the school whether paid or voluntary or directly employed by the school or by a third party.***

Christian Fellowship School and its governing body recognises its duty towards safeguarding and promoting the welfare of children as set out in Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014. As a school we believe that all children are a gift from God and that it is His will that they are protected from harm.

Our school will prevent and respond to abuse and neglect by ensuring that the ethos and atmosphere of the school is conducive to a safe environment. Pupils and parents/carers will feel supported and able to report safeguarding concerns to any member of staff or volunteer. Staff and volunteers will feel they are supported by colleagues and the senior management team, including the governing body, and are able to report and seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves. We will protect children at risk of abuse or neglect by having procedures in place that reflect current legislation, guidance and best practice.

Pupils will have opportunities to learn how to stay safe, good lines of communication with trusted adults, supportive peers and an ethos of protection. As part of our safeguarding ethos, we encourage children to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. We will ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the pupils, reasonably practicable steps will be taken to offer a balanced presentation of opposing views to pupils. We will ensure that reasonable steps are taken to ensure visitors to the school do not share messages with the school community which are contrary to our school ethos and beliefs.

## 2. Child Protection Statement

Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The school seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

**'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.'** (DFE 2023)

## 3. Definitions

**Child:** A child includes everyone under the age of 18. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

**Child Protection:** Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child.

**Safeguarding Children:** Action should be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment whether the risk of harm comes from within the child's family and/or outside (from the wider community) including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; promoting the upbringing of children with their birth parents, or otherwise their family networks through a kinship care arrangement, whenever possible and where this is in the best interests of the children, and taking action to enable all children to have the best outcomes set out in the [Children's social care: national framework](#) (DfE 2023)

**Abuse:** Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

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

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

**Neglect:** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**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.

Further information regarding the signs and indicators of abuse are set out in the DfE guidance [Keeping children safe in education 2023](#) and can be found within the School Improvement Liverpool Schools Safeguarding Handbook (see [Safeguarding Policy](#) folder for latest version.) This includes amongst others, the definitions and indicators of Child Sexual Exploitation, Child Criminal Exploitation (including County Lines), Serious Violence, Female Genital Mutilation, Forced Marriage, Honour Based Abuse, child on child abuse, Sexual Violence and Sexual Harassment (including sexting and other related issues), Vulnerabilities to Extremism and Children Missing Education.

#### 4. Policy Aims

- To ensure school takes appropriate action, in a timely manner, to safeguard and promote the welfare of all children
- To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately.
- To ensure that the school's practice meets local and national guidance and all statutory requirements are in place.
- To ensure that all the EYFS statutory safeguarding requirements are met. The Reception class pupils (EYFS) and staff are an integral part of the whole school and all aspects of this policy, its implementation and the training of staff apply to EYFS pupils and staff.

#### 5. Key Principles

- The child's needs and welfare are paramount. All children have a right to be protected from abuse and neglect and have their welfare safeguarded.
- Keeping Children Safe in Education (DfE 2023) reminds us that all staff should maintain an attitude of "*it could happen here*" where safeguarding is concerned.
- Children should be listened to and their views and wishes should inform any assessment and provision for them. Staff should always act in the interests of the child, in order to protect them.
- The school recognises that scrutiny, challenge and supervision are key to safeguarding children.
- The school is committed to working with other agencies to provide early help for children before they become at risk of harm or require a 'child in need' statutory assessment. '*Early Help means 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.*' (DfE 2022)
- All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead,

sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. (KCSIE, DfE 2023)
- All staff have responsibility to report their concerns about a child without delay to the Designated Safeguarding Lead, or in their absence the deputy designated safeguarding lead(s) or other senior member of staff. This should be done both verbally and in writing, using the agreed format. Whilst the Designated Safeguarding Lead will normally make referrals to Children's Services, anyone can refer their concerns to children's social care directly in emergencies or if they feel they need to do so. [Safeguarding - Mate](#) can support any member of staff through the process of making a referral.
- Everyone has the responsibility to escalate their concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. Concerns about a child should always lead to help for a child at some point and the child's situation should improve.
- The school will work in partnership with other agencies to promote the welfare of children and protect them from harm, including the need to share information about a child in order to safeguard them. *'Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.'* Working Together to Safeguard Children (DfE 2023)
- The school will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The school will follow the Local Authority and the Local Safeguarding Children Partnership procedures and provide them with information as required.
- Staff, children and families will need support following child protection processes being followed.
- Children will be enabled to learn ways to keep themselves safe from harm and exploitation.

## 6. Legislation and Guidance

This policy is informed by The Children Act 1989 and 2004, Section 157 of the Education Act 2002, the Children and Families Act 2014, [Keeping children safe in education 2023 - GOV.UK](#), [Working Together to Safeguard Children 2023 - GOV.UK](#) and the [The Independent School Standards - Guidance for independent schools 2019 - GOV.UK](#)

Schools and colleges must have regard for the DfE statutory guidance [Keeping Children Safe in Education](#) (DfE 2023). **This child protection policy should be read alongside this statutory guidance and all staff must read and understand at least Part 1 and Annex B of this guidance.**

This policy also references [School Improvement Liverpool Safeguarding Handbook 2023-24.pdf](#).

Local authorities have a duty to make enquiries under [section 47](#) of the **Children Act 1989** if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. There may be a need for immediate protection whilst the assessment is carried out.

A 'child in need' is defined under the **Children Act 1989** as a child who has been assessed by a social worker as unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child who is disabled. A social worker will lead and coordinate any assessment under [section 17](#) of the Children Act 1989.

[Section 175](#) of the **Education Act 2002** places a duty on local authorities (in relation to their education functions, and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions. The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under [section 157](#) of the same Act.

[Working Together to Safeguard Children 2023 - GOV.UK](#) (DfE 2023) provides additional guidance which makes it clear that protecting children from harm and promoting their welfare depends upon a shared responsibility and effective joint working between different agencies.

*Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.*

In addition, Working Together to Safeguard Children also reinforces the need to take action to provide early help before statutory services are required:

*'Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.'* DfE 2023

The school therefore understands its responsibility to engage with other professionals in Early Help Assessments when a child's needs according to the Local Safeguarding Children Partnership's Responding to Need and Level of Needs framework sit below the requirement for a statutory assessment.

**The Counter-Terrorism and Security Act 2015** places a duty upon local authorities and educational providers to 'have due regard to the need to prevent people from being drawn into terrorism'. The DfE has provided statutory guidance for schools and child care providers: ['The Prevent Duty'](#) (December 2023). The guidance summarises the requirements of schools and child care providers in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. Our school will ensure that staff are aware of the indicators of extremism and radicalisation and know how to respond in keeping with local and national guidance by completing regular training in relation to Prevent. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral via Children's Services to the Channel programme. Equally children will be made aware of the risks and support available to them. We will ensure that children are safe from terrorist and extremist material when accessing the internet in schools. The Government has developed an 'educate against hate' website providing information and resources for schools and parents to support them to recognise and address extremism and radicalisation in young people. Given Liverpool is a priority area, we can seek additional advice, guidance and training from the Local Authority's Prevent Coordinator or Local Authority's Prevent Education Officer (details in School Improvement Liverpool's Safeguarding Handbook).

'Section 5B of the **Female Genital Mutilation Act 2003** (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out

on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. DFE 2023 Information on when and how to make a report can be found at:

[Mandatory-reporting-of-female-genital-mutilation-procedural-information](#). The school will also consult the government guidance Multi-agency statutory guidance on female genital mutilation (revised 2016) and will have reference to guidance provided by the National FGM Centre FGM Schools Guidance - National FGM Centre.

In addition, the school recognises the important role schools have in safeguarding children from Forced Marriage. The Forced Marriage Unit has published Multi-agency statutory guidance, with pages 79-84 focusing on the role of schools and colleges. The school is clear that when it comes to the marriage of a child, the distinction between a forced marriage and an arranged marriage does not exist. Following the [Marriage and Civil Partnership \(Minimum Age\) Act 2022](#), which came into force in February 2023, it is an offence to engage in any conduct for the purpose of causing a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Such a marriage is deemed a forced marriage. (The same legislation also provides that the minimum age at which one can legally marry or enter into a civil partnership in England and Wales is 18.) School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufco.gov.uk](mailto:fmufco.gov.uk).

**Early years** providers have a duty under section 40 of the **Childcare Act 2006** to comply with the welfare requirements of the [EYFS statutory framework for group and school based providers](#)

The **Teachers’ Standards** (DfE 2013, updated 2021) also requires all teachers to ‘uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, including:

- treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher’s professional position
- having regard for the need to safeguard pupils’ well-being, in accordance with statutory provision
- showing tolerance of and respect for the rights of others
- not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- ensuring that personal beliefs are not expressed in ways which exploit pupils’ vulnerability or might lead them to break the law.

In addition, the **Sexual Offences Act 2003** makes it clear that all members of staff are in a position of trust and would therefore be committing a criminal offence to have a sexual relationship with a young person below the age of 18, even if that pupil is over the age of consent. In addition, it would be a breach of trust to have a relationship with any school

student over the age of 18.

The **Human Rights Act 1998** sets out fundamental rights and freedoms that everyone is entitled to and contains the Articles and protocols of the **European Convention on Human Rights** that are deemed to apply within the UK. It compels public organisations to protect and respect an individual's human rights when they make decisions about them. Under the human Rights Act it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,<sup>25</sup> and
- Protocol 1, Article 2: protects the right to education.

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

Schools and colleges also have obligations under the **Equality Act 2010** whereby schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, Keeping Children Safe in Education, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at [Equality Act 2010: advice for schools](#). The DfE has published specific non-statutory guidance for schools about handling gender questioning pupils: [Gender Questioning Children - non-statutory guidance](#)

The **Public Sector Equality Duty** does not apply to independent schools such as Christian Fellowship School. As an independent fee-paying school, we are subject to anti-discrimination law and pupils can issue proceedings for discrimination, harassment and victimisation as well as other conduct prohibited by the Equality Act 2010.

The school and this policy also takes account of additional guidance including:

- [CSE Definition and guidance for practitioners](#) DFE 2017
- [Criminal Exploitation of children and vulnerable adults: County Lines Guidance](#) DFE 2017
- [Disqualification under the Childcare Act](#) DFE 2006
- [Information sharing: Advice for practitioners providing safeguarding services](#) HMG 2018
- [The Prevent Duty - Departmental advice for schools and childcare providers](#) DFE 2015
- [Handbook for the inspection of association independent schools, including residential \(boarding\) schools and registered early years](#)
- Ofsted guidance: [Inspecting safeguarding in early years, education and skills](#)
- [How social media is used to encourage travel to Syria and Iraq](#) DFE 2015 (Briefing note for schools)
- [What to do if you are worried a child is being abused: Advice for practitioners](#) DFE 2015
- [Sharing nudes and semi-nudes: advice for education settings working with children and](#)

[young people](#) DDCMS / UKCIS 2020.

- [Serious Violence Duty: statutory guidance](#) Home Office 2022
- [Domestic Abuse: statutory guidance](#) Home Office 2022
- [Working together to improve school attendance](#) DFE 2022
- [Searching, screening and confiscation in schools - GOV.UK](#) DFE 2022
- [Relationships Education, RSE and Health Education](#) DFE 2021
- [Teaching online safety in School](#) DFE 2019
- Other DFE statutory guidance including: online safety and children who go missing from home or care is found here: [Schools-colleges-childrens-services/safeguarding-children](#)

## 7. Communicating with parents and visitors

The school is committed to the principles of Working Together to Safeguard Children which states that a 'child centred approach is fundamental to safeguarding and promoting the welfare of every child. *All practitioners should follow the principles of the Children Acts 1989 and 2004. These Acts make clear that the welfare of children is paramount and that they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary.*

The school has a published safeguarding statement on its website [Policies | Christian Fellowship School](#) that is available to all parents/carers. This summarises key elements of this policy and includes the following statement so they are aware of the school's responsibilities:

"The school has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. Schools are not able to investigate child protection concerns but have a legal duty to refer them. In most instances the school will be able to inform the parents/carers of its need to make a referral. However, sometimes the school can in certain circumstances share information without the consent of the family and may be advised by children's services or police that the parent/carer cannot be informed whilst they investigate the matter or make enquires. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The school follows legislation that aims to act in the interests of the child.

The school will always seek to work in partnership with parents and other agencies to ensure the best possible outcomes for the child and family."

Parents may request a hard copy of the Safeguarding Policy.

The following notice is made available to all visitors in reception which is displayed alongside the visitors' book:

"Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused or neglected. We would expect you to also report to the headteacher or Designated Safeguarding Lead any behaviours of any adults working in the school that may concern you. By signing our visitors book you are agreeing to follow the school's safeguarding advice to visitors and where appropriate the code of conduct for staff and volunteers."

In addition, all visitors are provided with additional safeguarding guidance. [Advice for Visitors](#)

The names and photographs of the Designated Safeguarding Lead and those who deputise for them are displayed in the reception lobby, the staffroom and on the parent notice board.

## 8. Roles and Responsibilities

The Head Teacher is: Rachel Boulton [rb@cfschool.org.uk](mailto:rb@cfschool.org.uk)

The Principal is: Graham Sharples [gs@cfschool.org.uk](mailto:gs@cfschool.org.uk)

The Chair of Governors is: Will Sopwith [ws@cfschool.org.uk](mailto:ws@cfschool.org.uk)

The Designated Safeguarding Lead is: Rachel Boulton [rb@cfschool.org.uk](mailto:rb@cfschool.org.uk)

Those trained to provide cover for the role of Designated Safeguarding Lead in case of illness or absence are: Steph Sharples [ss@cfschool.org.uk](mailto:ss@cfschool.org.uk), Annmarie O'Connor [ao@cfschool.org.uk](mailto:ao@cfschool.org.uk)  
Vicky Cooke [vc@cfschool.org.uk](mailto:vc@cfschool.org.uk)

The Designated Lead for Looked After Children is Steph Sharples [ss@cfschool.org.uk](mailto:ss@cfschool.org.uk)

The Senior Mental Health/Emotional Wellbeing Lead is: Annmarie O'Connor  
[ao@cfschool.org.uk](mailto:ao@cfschool.org.uk)

The nominated champion for Young Carers is Steph Sharples [ao@cfschool.org.uk](mailto:ao@cfschool.org.uk)

The nominated Link Safeguarding governor is: Jenny Oliver [jo@cfschool.org.uk](mailto:jo@cfschool.org.uk)

Gov with responsibility for online safety is: Jenny Oliver [jo@cfschool.org.uk](mailto:jo@cfschool.org.uk)

The nominated governor for dealing with allegations against the Head Teacher is:  
Will Sopwith [ws@cfschool.org.uk](mailto:ws@cfschool.org.uk)

The school phone number is 0151 709 1642

### All staff and volunteers should:

- Contribute to ensuring students learn in a safe environment.
- Maintain the belief that *'it could happen here'*.
- As a minimum read, understand and confirm they will follow:
  - Part 1 and Annex B of the DFE (2023) guidance Keeping Children Safe in Education
  - CFS Acceptable Use policy
  - CFS Staff Code of Conduct policy
  - CFS Anti-Bullying policy

and engage in training which enables them to identify children who may need additional help or who are suffering or likely to suffer significant harm and take appropriate action. Staff should have an understanding of the specific safeguarding issues outlined in part 1 and Annex B of the DFE (2023) guidance Keeping Children Safe eg. fabricated or induced illnesses, faith abuse. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truancy and sexting can put children in danger. Staff should be alert to the signs of child-on-child abuse and take appropriate action.

- Have access to Section 1 of the SIL Schools Safeguarding Handbook (Resources/Policies folder) which will further support knowledge and understanding of key issues to enable them to identify and respond to children who need additional help. Staff will ensure that they have read and understood this document.
- Recognise that any child may benefit from Early Help, but all school staff should be particularly alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether they have a statutory education, health and care plan or not)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines

- is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking sexual or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a family member in prison, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health problems and domestic abuse
  - is misusing alcohol or other drugs themselves
  - has returned home to their family from care
  - is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - is showing early signs of abuse and/or neglect
  - is a privately fostered child
  - is persistently absent from education, including persistent absences for part of the school day.
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school and/or can occur between children outside of these environments. All staff should consider whether children are at risk of abuse or exploitation in situations outside of their family home. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.
  - Be aware that emotional and mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are 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.
  - Understand that where children have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff should be aware of how these experiences can impact on a child's emotional wellbeing, behaviour and education.
  - Understand that all staff play an important part in working to prevent sexual harassment, online sexual abuse and sexual violence between children. Staff will assume that these behaviours are happening in our school and will work as part of a whole school approach to address such issues, including via the curriculum. Staff will understand how to handle reports of sexual violence or harassment.
  - Staff must ensure that they appropriately challenge any form of derogatory and sexualised language or behaviour to ensure that everyone is respectful at all times.
  - Report any concerns about a child's welfare without delay to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead or in their absence a senior member of staff.
  - Ensure that concerns are recorded using the school's agreed reporting procedure (CPOMS) in a timely fashion. Records will note the difference between fact and opinion. The child's voice will be made clearly evident.
  - Ensure that concerns relating to children remain confidential and are only shared with the appropriate staff with safeguarding and pastoral responsibility.
  - All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
  - Understand that any member of staff can make a referral to children's services should that be required, informing the Designated Safeguarding Lead of any action taken.
  - Understand their responsibility to escalate their concerns and 'press for reconsideration' if a child remains at risk or their needs are not met or if it appears that the school is not taking effective action in line with expected procedures. This includes the understanding that any member of staff can make a referral to Children's Services if required to do.

- Teachers and those providing teaching **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.
- Be aware safeguarding issues can manifest themselves via child-on-child abuse.
- Understand that it may be appropriate to discuss with the Head teacher matters outside of work, which may have implications for the safeguarding of children in the workplace. This includes information about themselves. Staff will ensure that they are aware of the circumstances where this would be applicable.
- Report any concerns (including those which might be considered to be low level concerns) without delay about the behaviour of an adult towards a child to the Principal, Head Teacher, Designated Safeguarding Lead or Chair of Governors and if required the Local Authority Designated Officer for Allegations against Staff.
- Follow the school's policies including this Safeguarding Policy and the school's code of conduct for adults and the [Guidance for safer working practice for those working with children and young people in education settings February 2022](#)
- Understand the circumstances where it may be necessary to 'self-report' incidents where they could have found themselves in a situation which could be misinterpreted, or may appear compromising to others, or if they have behaved in a manner which, on reflection, they consider to fall below the standards set out within the code of conduct for staff.
- Be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives (in or out of school or online), may impact on their work with children.
- Be aware that if their role is within the scope of the Childcare Act 2006 and they commit a relevant offence that would appear on their DBS certificate or they become disqualified under the Childcare Act 2006, then they must inform the Headteacher.
- Be aware that they should inform the Headteacher of any cautions, convictions or relevant order accrued during their employment, and/or if they are charged with a criminal offence.
- Understand that some children, including those with Special Educational Needs or Looked After, may be more vulnerable to abuse.

*'Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This can include:*

- *assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;*
- *these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;*
- *the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and*
- *communication barriers and difficulties in overcoming these barriers.'* (DFE 2023)

The DFE has provided additional practice guidance [Safeguarding Disabled Children](#) DfE 2009

- Have access to the school's Managing Allegations Against Adults procedures and Whistle Blowing policy. In addition, the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Have access to [What to do if you are worried a child is being abused 2015: Advice for practitioners](#)
- Understand that any indication of failure to follow any of the procedures set out within this policy will lead to a formal investigation by the school.

### **The Governing body should ensure that**

- The school meets the statutory responsibilities set out in [Keeping children safe in education 2023](#) and [Working Together to Safeguard Children 2023](#)
- The school has a strategy for providing early help together with other agencies and supporting children and families by carrying out early help assessments, drawing upon the LSCP's 'Responding to Needs Framework'.
- The Safeguarding Policy is reviewed annually and available to parents, normally via the school's website.
- All adults working within the school are aware of the school's Code of Conduct and that this guidance is in keeping with the DCSF [Guidance for Safer Working Practices for those working with children and young people in education settings Feb 2022](#)
- The school's practice is reviewed in line with Local Authority guidance, Liverpool Children's Safeguarding Partnership priorities and that any actions identified in the Local Authority 175 Audit are completed.
- There is a named Designated Safeguarding Lead who is a member of the school leadership team. Governors will ensure that this person has the appropriate status and authority within the school to carry out the duties of the post. They will be given the time, funding, training, resources and support to be able to provide advice and support to other staff on child welfare and child protection matters and to take part in strategy discussions and inter-agency meetings and/or to support other staff to do so, and to contribute to the assessment of children. There are colleagues trained to provide cover for the role. Governors will ensure that all staff undertaking the role of Designated Safeguarding Lead or Deputy will be identified explicitly and understand their role.
- The school has procedures in keeping with the LSCP for dealing with any allegations made against adults working for or on behalf of the school.
- There is a nominated governor, usually the chair, who is the case manager for managing any allegations against the Head Teacher.
- There is an additional nominated governor to liaise with the Designated Safeguarding Lead and champion child protection/safeguarding on behalf of the safeguarding team.
- The school follows safer recruitment procedures, including the statutory pre-employment checks on all staff working with young people. The Chair of Governors and safeguarding governor together with the headteacher should review the school's single central record.
- The school itself is a safe environment where the views of children and families are listened to and where children are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.
- The school audits the health and safety of the school environment and any actions arising from the audit are addressed.
- The school ensures there are appropriate filters and monitoring systems in place in respect of internet use and encourages safe and responsible use of digital technologies.
- It scrutinises the impact of the school's training strategy so that all staff, including temporary staff and volunteers, are aware of the school's child protection procedures. All staff must have child protection training which is regularly updated as part of a planned training programme and forms part of an integrated, aligned training programme which is considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake training in keeping with statutory training.
- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online safety) training at the point of induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective, and will support the delivery of a

robust whole school approach to safeguarding. This training should then be regularly updated. Governors who also undertake a child-facing role in school (either in a paid or voluntary capacity) will in addition, complete the school's safeguarding training for staff and volunteers.

- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, incidents of sexual violence or harassment, pupils taken off roll, the views and progress and participation of vulnerable pupils<sup>1</sup>.
- All safeguarding practices are quality assured by the leadership team, including the auditing of safeguarding records and the regular supervision of the Designated Safeguarding Lead and other members of the safeguarding team.
- The governing body will appoint an appropriately trained designated teacher to promote the educational achievement of children who are looked after, or have been previously looked after.
- There are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- There are clear systems and processes in place to identify and respond to issues of sexual violence or sexual harassment between children or harmful sexualised behaviours, including a sequenced curriculum designed to specifically address sexual harassment, online abuse, sexual violence and issues of consent in an age and stage appropriate way.

Governing bodies are accountable for ensuring the school has effective policies and procedures in place in line with local and national guidance, and for monitoring the school's compliance with them. Neither the Governing Body nor individual governors have a role in dealing with individual child protection cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

**The Headteacher and Principal will ensure:**

- The Single Central Record is maintained and up-to-date and the safer recruitment practices set out in Keeping Children Safe in Education 2023 are followed, including pre-employment checks. At least one member of every recruitment panel has attended safer recruitment training.
- Job descriptions and personnel specifications are in place for all roles and make specific reference to child protection and safeguarding.
- There is a listening culture within the school where both staff, children and parents are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service.

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<sup>1</sup> 'Vulnerable children' as a category is not clearly defined either in legislation or guidance. This report for the Children's Commissioner outlines different attempts over time to define vulnerability: [Constructing a Definition of Vulnerability – Attempts to Define and Measure](#) The report concludes that the child's perception of their circumstances should be a key factor in identifying whether they are vulnerable or not. It highlights the damaging effect that the labelling of vulnerability can have, the importance of aspiration and hope about the future and the role of agency and control. It draws attention to parental capacity as a factor that might make a child more or less vulnerable. We have therefore restricted the Vulnerable Children's register to pupils with an EHC plan, EHAT in place; looked-after children, previously looked-after children, children experiencing or at risk of abuse, sexual or criminal exploitation, neglect or other safeguarding harms, children who have experienced significant negative impacts of adverse childhood experiences (eg bereavement, family breakdown, serious medical conditions, etc). Children with other needs are identified on other registers, including: SEND register, Emotional Wellbeing register, EAL and Third Culture Kids registers, More Able Gifted & Talented registers. Some children will feature on more than one register. By identifying and reporting on each of these groups of children, we aim to ensure that all children achieve their potential and thrive, in line with the expectations about pupil wellbeing set out in our Wellbeing Policy.

- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- The Designated Safeguarding Lead has a job description in keeping with the requirements of Keeping Children Safe in Education 2023 and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead and who have undertaken the same training and who also have the role explicitly referenced within their job description.
- The curriculum provides opportunities to help students stay safe including when online. Children should be aware of the support available to them.
- They quality assure the school's child protection practices, including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately.
- The RSHE, PSHME and safeguarding curriculum is appropriately sequenced to ensure children are taught about key issues in a planned and age/stage appropriate way, building on previous knowledge as they move through the school.
- They quality assure the school's child protection practices including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately and that staff's emotional needs are met.
- The school meets its responsibilities under the Prevent Duty, including ensuring that reasonable checks are made on visiting speakers, and monitoring and filtering is in place across the school's IT systems. All staff have had opportunity for Prevent training either through face-to-face training or access to online resources.

#### **Designated Safeguarding Lead:**

The Designated Safeguarding Lead whose remit covers all pupils and staff, including those in EYFS, is a senior member of staff from the school's leadership team and the role is made explicit within their job description. The school has also appointed three deputy designated safeguarding lead(s) who are trained to the same level as the designated safeguarding lead and the role will also be explicit within their job description. However the lead responsibility remains with the designated safeguarding lead. All have completed relevant local training from School Improvement Liverpool and from Liverpool Safeguarding Children's Partnership (LSCP) and will receive ongoing training for the role.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

Keeping Children Safe in Education 2023 sets out the broad areas of responsibility for the Designated Safeguarding Lead within Annex C. These are detailed below:

#### **Manage referrals**

The Designated Safeguarding Lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required. The NPCC document [When to call the Police: Guidance for schools and colleges](#) can support with this.

## Work with Others

The Designated Safeguarding Lead is expected to:

- act as a point of contact with the safeguarding partners
- liaise with the Principal to inform him of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; this should include being aware of the requirement for children to have an Appropriate Adult when in contact with Police Officers who suspect them of an offence. The DSL (or deputy) will communicate any vulnerabilities known to the school to a police officer who wishes to speak to a pupil about an offence and this communication will be recorded on CPOMS. Further information can be found in the Statutory guidance [PACE Code C 2019 \(accessible\) - GOV.UK](#) .
- as required, liaise with the “case manager” (as per Part four of KCSIE) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, the SENDCo, mental health leads, IT support staff) 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 that children’s needs are considered holistically;
- liaise with the school’s Emotional Wellbeing lead where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Principal and Heads of School 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:
  - ensure 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; and,
  - support 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.
- work with the Virtual School Headteacher who retains a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children with a social worker
- act as a source of support, advice and expertise for all staff.

## Training and Implementation

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

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly 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 designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND) and young carers
- Understand the importance of information sharing, both within the school and with safeguarding partners, other agencies, organisations and practitioners.
- Are able to keep detailed, accurate, secure written records of concerns and referrals
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability within the Safeguarding team to keep children safe whilst they are online at school
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend relevant or refresher training courses as appropriate
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

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

### **Raising Awareness**

The Designated Safeguarding Lead should:

- Ensure each member of staff has access to, and understands, the school's child protection (safeguarding) policy and procedures, especially new and part-time staff
- Ensure that CFS child protection (safeguarding) policy is reviewed annually (as a minimum) and the procedures and implementations are updated and reviewed regularly, working with the governing body regarding this.
- Ensure the child protection (safeguarding) 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 CFS 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, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

Their role could include ensuring that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

### **Providing support to staff**

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

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

### **Understanding the views of children**

Understanding the views of children is essential to responding appropriately to their needs. It is important that children feel heard and understood. The designated safeguarding lead will be supported in developing knowledge and skills to:

- encourage a culture of listening and taking account of children's 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 trusting relationships which facilitate communication.

### **Holding and sharing information**

The Designated Safeguarding Lead 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, between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

### **Child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information is kept confidential and stored securely. Records include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome. Files are only accessed by those who need to see it and any sharing of information happens in line with information sharing advice set out in Keeping Children Safe in Education.

Where children leave the school or college (including for in year transfers) the designated safeguarding lead should ensure their child protection (safeguarding) file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Where possible, the designated safeguarding lead should review the child protection (safeguarding) files for transfer prior to the pupil's anticipated transfer date, ensuring that the information in the safeguarding

records is accurate, up-to-date and has due regard to data subject rights in the context of special category personal data.

Where we receive safeguarding files from other schools, the designated safeguarding lead should make colleagues (such as deputy DSLs, Heads of School, SENDCo) aware as required.

In addition to the child protection (safeguarding) file, the designated safeguarding lead should also consider sharing any information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard the child and help the child thrive in the new setting. A lack of information about a child's circumstances can impact on the child's safety, welfare and educational outcomes. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Information that the designated safeguarding lead should consider sharing includes:

- The current level of need: Looked After Child or Previously Looked After Child, Child Protection, Child In Need (as assessed by a social worker), Early Help, Level 1/monitoring
- A summary of the child's needs; current safeguarding concerns and any relevant context or historic concerns
- Any other relevant information, including any current risk assessment, that could support transition planning
- Name and contact details of the named social worker, lead practitioner, or other key professionals
- Dates of forthcoming multi-agency meetings where joint attendance may be appropriate.

### **Availability**

During term time the Designated Safeguarding Lead (or a deputy) should always be available during school hours for staff to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, in exceptional circumstances availability could be via phone and or Google Meet.

The Head Teacher, Principal and designated safeguarding lead should arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

According to Local Guidance it is expected that the Head Teacher will be the case manager for any allegations against staff and make referrals to the Disclosure and Barring Service and/or Teaching Regulation Agency.

**In addition to the role outlined in Keeping Children Safe the Designated Safeguarding Lead is also expected to ensure that:**

- The school has a specific safeguarding email account [safeguarding@cfschool.org.uk](mailto:safeguarding@cfschool.org.uk) which is accessible by all members of the safeguarding team, and ensures that all communication of a safeguarding nature is seen and responded to by the school.
- The social worker is notified if a child subject to a child protection plan is absent without explanation.
- The social worker is informed when a child subject to a child protection plan or a child in need plan, moves to a new setting.
- A training log is kept of all Safeguarding training including the names of those attending. All staff must have regular training. Staff or volunteers who are unable to attend training will be offered the chance to receive missed training at the earliest opportunity.
- Child protection (safeguarding) records are kept securely and separately from the child's normal file. Records will be transferred and/or retained in keeping with the Local Authority and NSPCC guidance.
- The school attends and contributes to child protection case conferences and child in need meetings, ensuring actions are completed in a timely manner. The school will complete the LSCP agency report ahead of each child protection conference.

- The school escalates its concerns with other agencies when a child's needs are not being met following the Local Safeguarding Children Partnership Escalation and Resolution Policy.
- All members of the safeguarding team have received appropriate training; that all referrals made are quality assured and that regular safeguarding supervision is provided to the safeguarding team to monitor all decisions and actions taken alongside the well-being of each team member.
- All staff read and understand part 1 and Annex B of the DfE (2023) guidance Keeping Children Safe in Education and make available to them other key documents and guidance.
- The school has an appropriately trained member of staff in order to fulfil its obligations under Operation Encompass, and that the school's commitment to Operation Encompass is known throughout the school community via the means of staff training, parental letters, posters and the school website.

## 9. Safeguarding Framework

In addition to this child protection (safeguarding) policy the school has procedures or policies in relation to other areas for safeguarding children including:

- Attendance
- Administration of medication in school
- Anti-bullying (including cyber bullying)
- Behaviour
- Children missing from education (part of Attendance policy)
- Educational visits
- Data protection
- Disability access plan
- Drugs and substance misuse
- Equality objectives
- Emergency fire evacuation plan & lockdown procedure
- Emotional wellbeing
- First aid
- ICT & online safety
- Intimate care
- Looked After Children (Children in Care)
- Managing allegations against staff and volunteers
- Off-site provision
- Relationships and sex education (RSE)
- Risk assessments
- Safeguarding advice for visitors
- Safer recruitment practices
- School & site security
- School Emergency Management Plan (SEMP)
- SEND
- Staff and volunteers code of conduct
- Taking and using photographs (part of ICT & online safety)
- Whistle-blowing

## 10. Training and Induction

**Induction training:** All staff and volunteers working in the school must be given a copy of this Child Protection (Safeguarding) policy immediately upon starting work at the school, as part of their induction. Other documents that new staff/volunteers/governors should be made aware of are listed in the [Mandatory Safeguarding Check List \(Staff/Volunteers\)](#) and section 14 below.

All staff and volunteers working in the school must complete safeguarding training appropriate to their role as part of their induction, and at least annually thereafter. As part of the requirement for all staff to undergo regular updated safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), safeguarding training is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. The school's safeguarding training plan builds upon existing staff knowledge, in addition to refreshing key knowledge, and is pertinent to the needs of the school community. The school draws upon School Improvement Liverpool's induction template and Safeguarding Induction Booklet (Schools' Safeguarding Handbook) to ensure all appropriate policies and guidance are shared.

Every academic year, approximately 6 hours of staff/volunteer safeguarding training is delivered. These hours are split in approximately the following way:

- September inset: 1 hr session
- January inset: pre-reading + 15 min session on two topics 1 hr
- April inset: pre-reading + 15 min session on two topics 1 hr
- June inset: pre-reading + 15 min session on two topics 1 hr

Termly CPD training: one in-person training session per term on Monday/Wednesday staff training slot with pre-reading and post-training assessment of learning quiz 2+ hours

The Designated Safeguarding Lead and deputies will complete the same regular safeguarding training relevant to their role. This level of training must be refreshed at least every two years, with further safeguarding training to be accessed on a minimum of an annual basis as best practice. This is to ensure designated staff have appropriate, up to date knowledge and skills which will enable them to identify concerns and make decisions that support the safety of the school community.

The Governing Body should receive appropriate safeguarding and child protection (including online safety) training at the point of induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective, and will support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated. Governors who also undertake a child facing role in school (either in a paid or voluntary capacity) will in addition, complete the school's safeguarding training for staff and volunteers. The Link Governor for Safeguarding should attend appropriate training to enable them to fulfil the expectations of the role.

All staff have had opportunity for Prevent training either through face to face training or access to online resources: [Prevent duty training](#)

The school will keep a safeguarding training log evidencing the training attended by the different groups of staff/governors and will seek to evidence the ongoing impact of this training.

Regular contractor staff such as grounds maintenance will know the identity of the Designated Safeguarding Lead so that they can pass on concerns and adhere to appropriate behavioural boundaries.

## 11. Procedures for reporting child protection or child welfare concerns

- All members of the school community have a statutory duty to safeguard and promote the welfare of children and young people. Staff and governors should not investigate possible abuse or neglect themselves.
- School Improvement Liverpool provide an online resource 'Safeguarding-Mate' to support colleagues decision making: [SIL Safeguarding-mate](#)
- All concerns should be reported **without delay** directly to the Designated Safeguarding Lead, Designated Safeguarding Deputy, Principal or any member of the School Leadership

Team. This should be done verbally and then followed up with a written account of the concerns on CPOMS. Staff should ensure that they assign the CPOMS incident report to the appropriate Head of School and must alert all members of the safeguarding team. The report should include any description of injuries with a body map completed.

Please note: Whilst the Designated Safeguarding Lead will normally make referrals to Children's Services, **any** staff member can refer their concerns to children's social care directly in emergencies or if they feel they need to do so. (Liverpool Careline 0151 233 3700) Parental consent is not needed for a referral when a child is suspected of or is likely to be suffering significant harm, although consent is preferable and should be sought, if safe and appropriate to do so.

If you feel that insufficient action has been taken, refer to the DSL again and speak to the Principal. If your concerns remain or if you are not satisfied with any action taken by those authorised to deal with safeguarding concerns, you can contact Liverpool Careline directly to report your concerns on 0151 233 3700. See CFS Whistleblowing policy

- Consideration will need to be given to immediately protecting the child and contacting the police and/or ringing for an ambulance if the child is injured. In the event of obvious injury to the child, the DSL, Head Teacher or Principal should make arrangements for the child to be accompanied to the accident and emergency department at Alder Hey Hospital (0151 228 4811) and parents/ carers informed.
- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will take immediate action without delay and will make a referral to children's services by telephone if a child is believed to be suffering or likely to suffer significant harm. This referral will always be followed up in writing.
- Children's Services contact details are as follows: Liverpool Careline Hub 0151 233 3700
- The Designated Safeguarding Lead will follow the LSCP and Local Authority multi-agency procedures and consider the child's needs alongside the LSCP's Levels of Needs/Responding to Needs Framework (Threshold document) and consider whether an early help assessment or referral to children's services is needed. [liverpoolscp.proceduresonline.com](http://liverpoolscp.proceduresonline.com)
- Concerns about a child should always lead to help for a child. The school may need to escalate its concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure an Early Help Assessment is completed.
- The school will always seek to follow the Local Safeguarding Children Partnership procedures which can be found on their website.
- The Designated Safeguarding Lead or Deputy is able to refer to an online tool which helps professionals assess a child's level of need and decide which method of referral they should complete (EHAT or MARF). The online 'Levels of Need Slider' tool and Levels of Need indicators and windscreen can be accessed here: [Children at risk \(MARF referrals\) - Liverpool City Council](#) Schools can also make a Level 3 Early Help referral using the following link: [Access early help support - Liverpool City Council](#)
- If the school does not receive feedback within one working day regarding the outcome of a referral made to Children's Services, the Designated Safeguarding Lead will contact Children's Services immediately to determine the outcome of the referral.
- If school disagrees with the outcome of a referral, the Designated Safeguarding Lead will ask to speak to the social worker and/or manager who made the decision. Following this conversation, if they remain dissatisfied they will follow the Local Safeguarding Children Partnership Escalation and Resolution Procedures.

'School Improvement Liverpool Schools' Safeguarding Handbook' and Part 1 of Keeping

Children Safe in Education (DFE 2023) provides key flowcharts and guidance to support staff and volunteers' understanding and decision making. This will support staff to make a referral themselves should that become necessary. The Designated Safeguarding Lead should be informed, as soon as possible, following the need for another member of staff to make a referral.

'School Improvement Liverpool Schools' Safeguarding Handbook' will provide additional guidance about indicators of abuse and harm and how to respond to a disclosure. Guidance is also available on the NSPCC website: [Keeping children safe | NSPCC](#)

If a teacher in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. Keeping Children Safe in Education provides additional guidance.

Concerns that a child is being radicalised should follow the normal safeguarding referral mechanism with an additional Channel or Prevent referral being made to the Local Authority's Prevent and Channel team. Contact details can be found in the Liverpool School's Safeguarding Handbook.

## 12. Process to follow if a child makes a disclosure

If a child makes a disclosure of abuse, staff should:

*During the conversation with the child*

- Listen and keep calm. Do not interrupt
- Explain that you want to help the child.
- Not promise the child that they will keep the matter confidential. Explain to the child who they will need to tell and why
- Observe visible bruises and marks, but should not ask a child to remove or adjust their clothing to view them
- Keep questions to a minimum as their role is not to investigate. If staff need to ask questions in order to ascertain whether this is a safeguarding concern, they should ensure they are open questions
- Use the "TED" model for asking open ended questions: "Tell me about that", "Explain that to me", "Describe that for me"
- Explain what you will need to do next, in their language.

Staff should not:

- Ask leading questions, put words into the child's mouth, prompt or press for details
- Rush the child
- Examine the child
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events

*After the conversation with the child*

- Make a record of what has been said ~~as accurately as possible~~ immediately afterwards in words used by the child and the member of staff to the best of their memory. Use capital letters for the child's words to help distinguish between the two. Where possible, use CPOMS to make a written report of the concern, assigning it to the DSL and alerting the DSL and Deputies. If it is not possible to make a CPOMS report straightaway, do so as a matter of urgency and priority as soon as possible
- Note anything about the child which is connected i.e. any visible injuries including the position and description, the demeanour of the child i.e. crying, withdrawn etc.

- Clearly indicate whether fact, opinion or third party information.
- Verbally report the matter immediately to the Designated Safeguarding Lead or a deputy DSL or the Principal. Verbal communication must happen to ensure concerns have been received and read.
- Seek advice from the Designated Safeguarding Lead or a deputy DSL if in doubt
- Do not delay sharing the information with the Designated Safeguarding Lead or other member of the safeguarding team.
- Do not discuss with anybody else.

Further information can be found in part 1 of the School Improvement Liverpool Schools Safeguarding Handbook, including examples of leading or otherwise inappropriate questions, and for suggestions of 'safe questions'.

*All staff should also be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.*

### **13. Confidentiality, information sharing, record transfer, record keeping and retention**

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their education outcomes. Schools have clear powers to share, hold and use information for these purposes.

The school recognises that all matters relating to child protection are confidential. The Principal/Head Teacher, Designated Safeguarding Lead and Deputies will disclose any information about a child to other members of staff on a 'need to know basis' only. Guidance about sharing information can be found in the 2018 document [Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018](#) and the [Data protection: toolkit for schools](#).

*Staff cannot promise children confidentiality but must always act in the best interests of the child and share disclosures made by the child or others with the Designated Safeguarding Lead. All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children.*

The school understands the need to keep child protection and safeguarding records securely. Most child protection records are stored on CPOMS. Where the record is not digitised, the record is kept in a locked filing cabinet in a lockable office, separate from any other school information, including welfare information. Only the Principal, Designated Safeguarding Lead and Deputy Safeguarding Lead will have access to this filing cabinet. In addition, GDPR requirements are followed with regard to all data held by the school, in accordance with the Data Protection Act 2018.

The school will aim to seek consent of parents before sharing information with other agencies, however legislation states that schools and other agencies can share information without the consent of a parent/carers in particular circumstances.

The school pays due regard to the relevant data protection principles which allow us to share personal information, as provided for in the [Data Protection Act 2018](#) and the [General Data Protection Regulations](#) (GDPR). The school is aware of the processing conditions under the Data Protection Act 2018 and the GDPR which allow the school to store and share information

for safeguarding purposes, including information which is sensitive and personal, and this is treated as 'special category personal data'. Where school would need to share special category personal data, we are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows us to share information. This includes allowing school to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that we can gain consent, or if to gain consent would place a child at risk.

*'The Data Protection Act 2018 and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare ...  
... Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children' (DfE 2023).*

Where possible, the designated safeguarding lead should review the child protection (safeguarding) files for transfer prior to the pupil's anticipated transfer date, ensuring that the information in the safeguarding records is accurate, up-to-date and has due regard to data subject rights in the context of special category personal data.

Prior to transferring the child protection records securely to the next setting, the Designated Safeguarding Lead will (whenever possible) discuss the child's needs with their counterpart before the child starts at the next setting. After reviewing the required child protection records (checking for accuracy, relevance and conformity with data protection rules for schools), the Designated Safeguarding Lead will speak to their counterpart in the school to which the child is transferring in order to ensure that they are aware that the file is to be transferred. Upon confirmation of the child starting on roll the file should be transferred as soon as possible (within 5 school days), but separately to the main school file. The Designated Safeguarding Lead will consider whether it is possible and more appropriate to use CPOMS, another secure digital transfer method or to send over a paper file. Where the latter method is used, the file should be signed upon receipt, and delivered by hand.

The school will retain records in keeping with NSPCC guidelines: [Child protection records retention and storage guidance | NSPCC Learning](#). This in turn references the [IRMS Schools Toolkit - Information and Records Management Society](#).

School Improvement Liverpool's Safeguarding Handbook provides further guidance for transferring records. Refer to the following policies for more information:

Please refer to the following policies for further information

- Information sharing - Within school
- Information sharing – Partnerships with outside agencies

#### **14. Additional child protection guidance to be provided to all adults working with young people**

- Part 1 of Keeping Children Safe in Education and Annex A if appropriate, and Annex B (DfE 2023)
- CFS Code of Conduct for staff and volunteers
- Extract from General Staff Handbook - Staff roles, welfare and safeguarding
- CFS ICT & Online Safety policy
- CFS ICT & Acceptable Use policy
- CFS Health and Safety policy
- CFS Equality Objectives policy
- CFS Intimate Care policy
- CFS Children Missing from Education policy (part of Attendance, CME, EHE, Flexi-Schooling and Distance Learning policy)
- CFS Behaviour and Discipline policy

- CFS Anti-bullying policy
- CFS Child collection (inc EYFS) and missing child policy
- What to do if you are worried a child is being abused (2015)
- Guidance for Safer Working Practices for Adults Working with Children (Safer Recruitment Consortium 2022)
- Managing Allegations Against Adults
- Whistle-blowing policy
- Information about emergency evacuation procedures

## 15. Managing allegations against adults (including all staff and volunteers) working at or on behalf of the school

CFS will work to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour as set out in the staff and volunteer code of conduct, are consistently lived, monitored and reinforced by all staff. There may however be occasions where the behaviour of adults causes concern, either within the school community or in external contexts used by the school for activities, trips and visits, etc.

All staff and volunteers must report any concerns about the behaviour towards children of any member of staff or volunteer, or another adult working within the school or the grounds or in an external context (eg. swimming or at a residential), this should be reported immediately to the Head Teacher, Rachel Boulton, [rb@cfschool.org.uk](mailto:rb@cfschool.org.uk) (or in their absence to the Principal, Graham Sharples, [gs@cfschool.org.uk](mailto:gs@cfschool.org.uk) who will then follow the CFS Procedures for Managing Allegations Against Adults. Concerns can also be discussed with Steph Sharples, Deputy Designated Safeguarding Lead. If the concern relates to the Head Teacher, please report to the Chair of Governors, Will Sopwith [ws@cfschool.org.uk](mailto:ws@cfschool.org.uk) without informing the Head Teacher.

Local Safeguarding Children Partnership multi-agency procedures will be followed in all cases where it is alleged that a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The school's *Managing allegations against adults* policy will support everyone to take appropriate action, with further information about what steps will be taken in the CFS Procedure for Managing Allegations Against Adults. The policy includes a flowchart to guide colleagues' thinking. In addition, School Improvement Liverpool provides an online resource 'Safeguarding-Mate' to support colleagues' decision making: [Safeguarding - Mate](#). Part 4 of the DFE guidance 'Keeping Children Safe in Education' provides further guidance. For more information about Liverpool's multi-agency procedures, see [Liverpool Safeguarding Children Partnership Procedures](#). See also CFS Whistleblowing policy.

In some circumstances, the school will have to consider an allegation against an individual who is not directly employed by the organisation and where our disciplinary procedures do not fully apply (for example peripatetic teachers). Whilst the school is not the employer of the individual, we still have responsibility to ensure allegations are dealt with properly. The school will not seek to prevent the use of the services of a peripatetic teacher as a result of safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

Concerns can be taken directly to the Local Authority Designated Officer (LADO), if needed,

via Children's Services.

There are occasions when a person who works with children behaves in a way that is concerning and raises questions about their ability to recognise and take steps to safeguard children in their care that may not always meet the threshold of LADO referral. As an employer the school has a duty to consider whether the issue indicates that they are unsuitable to continue in their role for the immediate future or indefinitely. These are known as 'issues of suitability' and if they do not meet the harm threshold for allegations they would be dealt with via the school's disciplinary and low level concerns procedures. Issues of suitability can include:

- Where an employee is being investigated for an offence against an adult, or
- Their behaviour in their personal lives brings into question their suitability to work with children

However if an adult who works with children has involvement from Children's Services in respect of their own child, or a child that they live with or have contact with, it is the responsibility of Children's Services to assess the immediate concern and inform the LADO of whether the adult poses a risk to children. Examples of this may include:

- Allegations of assault, physical or emotional, on their own child or on a child they live with or have contact with
- Domestic abuse
- Substance misuse
- Lives with or is in a relationship with a person who is identified as a risk to children

The situation would meet the threshold of LADO should the child in question be made subject to a Child Protection plan. This is because Children's Services has determined that the adult presents a risk to the associated child either directly or due to a failure to protect.

If school is made aware of any of the circumstances detailed above, they will have a consultation with the LADO in order to determine whether the threshold is met for a referral under the managing allegations process.

*All staff should ensure that they disclose information about themselves relating to the above to the Head Teacher as soon as possible. School will create an environment and culture where staff are supported and empowered to be able to do this.*

If the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purpose of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the school will follow its own policies and procedures, including informing the LADO.

## **16. Low level concerns**

Our school recognises that there may be times when there are concerns about a professional's behaviour which do not meet the harm threshold as set out in section 15 of this policy. This includes third party staff and volunteers. Concerns such as this may arise in several ways and from a number of sources. Examples of this may be:

- suspicion, complaint or disclosure made by a child, parent or other adult within or outside of our school; or
- as a result of vetting checks undertaken during recruitment

Our school promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. Creating this culture in which all concerns are shared responsibly, in a timely way with the right person, and are recorded and dealt with appropriately is critical to effective safeguarding practice. This culture enables the school to identify concerning, problematic or inappropriate behaviour at the earliest possible stage, minimises the risk of abuse and ensures that all adults working in or

on behalf of the school are clear about professional boundaries and act within these, in accordance with our ethos and values. This culture also empowers individuals to share concerns with key staff about their own behaviour at the earliest possible opportunity.

The term 'low level concern' does not mean that the behaviour is insignificant. It means a behaviour towards a child which does not meet the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2023. A low level concern is any concern (no matter how small, and even if no more than causing a sense of unease) that an adult working in or on behalf of the school may have acted in a way that:

- is not consistent with the staff code of conduct, including conduct outside of the workplace, and/or
- does not meet the allegations threshold or is otherwise not considered serious enough for a referral to the LADO.

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; or,
- humiliating children.

Behaviours which are not consistent with the standards and values of our school, and which do not meet the expectations set out in our code of conduct for staff, must be addressed. Behaviours such as this, can exist on a spectrum from inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is essential that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately. Effective reporting and management of such concerns also protects staff from potential false allegations or misunderstandings.

All low level concerns should be reported in writing and in a timely fashion to the Head Teacher. Where the concern relates to the Head Teacher or Designated Safeguarding Lead, the concern should be reported to the Principal or Chair of Governors, who will follow the Procedure for Managing Allegations Against Adults. Concerns about the Governor with Safeguarding Responsibility should be passed to the Chair of Governors and Head Teacher, who will then follow the Procedure for Managing Allegations Against Adults. Where conflict of interests exist in reporting the matter to the Head, Principal and Chair of Governors, concerns should be reported directly to the LADO.

Concerns should be shared as soon as is reasonably possible, and ideally within 24 hours of becoming aware of a problem; however it is never too late to share a concern.

Staff do not need to be able to determine whether their concern is a low level concern, or if it would be dealt with under our managing allegations policy. Staff are simply empowered to share their concern. The determination regarding the process to be used will be made by the Designated Safeguarding Lead (Head Teacher) in consultation with the Principal.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or may appear compromising to others. Equally, a member of staff may have behaved in a manner which, on reflection, they consider to fall below the standards set out within our code of conduct for staff. Self-reporting of such circumstances is actively encouraged as it allows issues to be dealt with at the earliest opportunity and it is an important means of maintaining our culture of everyone aspiring to have the highest standards of conduct and behaviour.

If a report of a low level concern is received, it will be dealt with responsively, sensitively, and proportionately. Where a concern is reported, the Headteacher should collect as much

evidence as possible by speaking directly with the person who raised the concern (unless it has been raised anonymously), and by speaking to the individual involved along with any witnesses. The information collected will help to categorise the behaviour and determine what further action may need to be taken. Support and advice will be provided to ensure any identified behaviours can be corrected at an early stage.

All low level concerns will be recorded in writing and this record should include the details of the concern, the context and the action taken, including the rationale for any decisions. The name of the person reporting the concern should be noted unless the person wishes to remain anonymous. The log is kept confidential and held securely in the Head Teacher Confidential folder in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. A note is placed in the member of staff's personnel file to indicate that the Head Teacher/Principal should refer to the log as required. The information on the log is retained for seven years after the member of staff leaves employment or ceases to volunteer at the school.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of such behaviour is identified, the Head Teacher & Principal will decide on a course of action. This might be through our disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, referral to LADO. The school will consider if any wider cultural issues in school that enabled the behaviour to occur, and if appropriate policies will be revised or extra training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken must be recorded.

The Headteacher will review all low level concerns, along with the outcome of the concerns, whenever a new concern is reported to them. This is to ensure there is appropriate scrutiny and analysis of information in order to agree at what point a series of low level concerns or a pattern of behaviour would escalate and meet the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2023.

Low level concerns will not be included in references unless they relate to an issue which would normally be included in a reference. Paragraph 441 of Keeping Children Safe in Education specifies: *"Schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references."*

If an allegation results in a dismissal, resignation, or the individual otherwise ceases to provide services, or the school ceases to use the person's services, this will be reported to the DBS.

In the case of a member of teaching staff, the DSL and Head Teacher will consider whether to refer the matter to the Teaching Regulation Agency to consider whether the individual should be prohibited from teaching.

The CFS Procedures for Managing Allegations Against Adults policy sets out in full the procedures for dealing with allegations.

## **17. Allegations of abuse against another pupil (child on child abuse), including issues of sexual violence and harassment**

### ***Child-on-child behaviour***

Staff should recognise that children are capable of abusing other children and that not all children will find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, for example a friend may make a report or a member of staff may overhear a conversation.

Behaviours can happen in school, online or in the community and are most likely to include, but not limited to:

- abuse within intimate personal relationships between peers;
- bullying (including cyber bullying, prejudice-based and discriminatory bullying);
- serious violence;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, “jokes”, taunting and online sexual harassment which may be standalone or part of a broader pattern of abuse;
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes;
- displaying pictures, photos or drawings of a sexual nature;
- causing someone to engage in sexual activity without consent;
- online sexual harassment including consensual and non-consensual sharing of nude and semi-nudes images and/or videos, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments and messages including on social media, sexual exploitation, coercion and threats and coercing others into sharing images of themselves or performing acts they are not comfortable with online;
- upskirting, which typically involves taking a picture under a person’s clothing without their permission (this is a criminal offence);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and many also include an online element).

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of the protections set out under the **Human Rights Act 1998**, depending on the nature of the conduct and the circumstances. (The Public Sector Equality Duty is not applicable to CFS as we are not a public sector body.)

Children with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these children. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm; however children who are LGBT+ or perceived to be, may also be targeted by their peers and harassed or assaulted. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that all staff endeavour to reduce the additional barriers faced, and provide a safe space for children to speak out or share their concerns.

Allegations of child-on-child abuse will be recorded, investigated and dealt with in line with the school’s Anti-Bullying Policy, this Safeguarding Policy, the Behaviour and Discipline Policy and the guidance in Keeping Children Safe in Education 2023, part 5.

### ***Preventing child-on-child abuse***

Staff must not assume that because there are no specific reports of sexual violence or sexual harassment, children are not experiencing it. Staff must ensure that they challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing, particularly towards girls or other vulnerable groups of children. Behaviours by children should never be passed off as ‘banter’, ‘having a laugh’ or ‘part of growing up’ as this can lead to an unsafe culture which normalises abuse and inappropriate behaviours and can lead to children accepting it as normal and therefore not reporting such issues.

Our school will prevent sexual harassment, online sexual abuse and sexual violence through a carefully planned and sequenced relationships, sex and health education curriculum alongside

effective challenge and response to specific issues when they arise. All pupils are taught anti-bullying messages via regular PSHME and assembly input, and learn about showing respect to other people, the issue of consent and the importance of reporting concerns as documented in the Safeguarding Curriculum map. Pupils are taught about the different roles in a bullying situation and that all who participate in harming another child are held responsible, regardless of the role they played. Please refer to CFS Anti-Bullying policy for more information. The school curriculum will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including 'sexting' or 'initiation/hazing' behaviours.

The impact of teaching about this aspect of the safeguarding curriculum will be assessed in line with the overall assessment strategy for PHSME. This will include teacher reflection on written comments by students on worksheets and their contributions during class discussions.

To minimise the risk of child-on-child abuse and other harms, the school ensures:

- an appropriate level of supervision at break times and staff are expected to remain vigilant at all times to any signs of verbal, physical or social harms; pupils are required to keep in sight of supervising staff; during wet breaks, staff monitoring of classrooms is supplemented by prefects from the senior classes
- appropriate staffing levels at off-site activities, including visits and residential trips; when pupils walk or travel by minibus to swimming, there must always be sufficient staff to monitor pupil interactions both on the journey and at the pool
- that pupils' behaviour on Chromebooks is monitored through Classroom Cloud, enabling senior leaders to pick up on potential or actual abuse situations; monitoring spot-checks of pupils' online school accounts are also used to reveal potential or actual abuse situations
- that parents are encouraged to actively monitor their children's interactions with other CFS children out of school in age appropriate ways and report concerns into school; this includes their children's online interactions with other children.

The school regularly reviews decisions and actions, and relevant policies are updated to reflect lessons learned, in particular in relation to potential patterns of concerning, inappropriate, problematic, or abusive behaviour. Where a pattern is identified, the school will not only decide on a course of action, but also consider whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and what will be done to minimise the risk of it happening again. This may be achieved through extra teaching time and/or staff training.

Each time Part One of KCSIE is updated by the DfE, existing staff will be updated through either distribution and acknowledgement of updated policy changes and/or training as appropriate. It is recognised that this is particularly important when new duties are introduced, such as with the introduction of Prevent, and recognition of additional types of abuse

### ***SEND pupils***

Children with special educational needs and disabilities are more vulnerable to child-on-child abuse, and staff should be aware that additional barriers can exist when recognising abuse in these children. Matters of gender and sexual orientation can lead to additional safeguarding challenges. Children who are questioning their gender or sexual identity may experience a greater level of vulnerability for various reasons. The school should identify the risks to pupils with protected characteristics and put mitigations in place to reduce these risks, recognising that additional action may be required to ensure their safety and protection.

When a child with special educational needs and disabilities is the perpetrator of child-on-child abuse, careful consideration should be given to the most appropriate way of helping that child understand the problem with his/her behaviour and reasonable adjustments may need to be

made to sanctions. The needs of the SEND pupil must be balanced against the need of the victim to be acknowledged, protected and to see justice done.

### **Reporting abusive behaviours**

Children are taught to report concerns to their form teacher, a member of the safeguarding team or any trusted adult in school. They are also encouraged to share concerns with friends or parents, who can support them to inform an adult at school.

Parents are encouraged to play a key role in reporting any online or out-of-school bullying or other harmful behaviour to the school. All parents at the admission interview are advised about the importance of monitoring their child's online life in an age-appropriate manner and about the reliance we place on vigilant parents to observe and report harmful behaviour as early as possible.

Staff should report any concerns about potential sexual harassment to a member of the safeguarding team and write an incident report on CPOMS, assigning the incident to the DSL and alerting all members of the safeguarding team.

Staff should report any concerns about the consensual and non-consensual sharing of nude and semi-nude images and /or videos or 'upskirting' to the Designated Safeguarding Lead or deputy who will follow the guidance in [Sexting: how to respond to an incident](#) The UK Council for Child Internet Safety (UKCCIS) provides clarity as to how staff should respond to these incidents. Making, possessing and distributing imagery of someone under 18 which is 'indecent' is illegal.

All concerns (whether first reported by a pupil, parent or member of staff) must be reported on CPOMS and then discussed with the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, Principal or another member of the Senior Leadership Team. Concerns over bullying will also be reported to the form tutor and Head of School.

The procedures outlined in the CFS Anti-Bullying Policy will guide the response to any incidents of bullying or child-on-child abuse. Records of incidents of bullying or child-on-child abuse will be held securely on CPOMS. Parents will be kept informed as the incident is responded to, as per the CFS Anti-Bullying Policy.

### **Responding to negative child-on-child behaviour**

The DFE states *'The initial response by a school or college to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.'*

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting an incident and they will never be made to feel ashamed or their experience minimised. Victims of bullying<sup>2</sup> will be supported by form teachers or other members of staff, and other students may be involved in actions to support the victim, as per the Anti-Bullying Policy.

When responding to reports of child on child abuse, the Designated Safeguarding Lead will

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<sup>2</sup> Bullying is a behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying and abuse can take many forms (for instance, cyber-bullying via text messages or the internet), and can be motivated by prejudice against particular groups, for example on the grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. There is an imbalance of power so that the perpetrators of bullying have control over the relationship, which makes it difficult for those they bully to defend themselves.

respond to each report on a case-by-case basis.

Victims of child-on-child sexual harm will be supported by the school's pastoral system and referred to specialist agencies including, for example, 'CAMHS', and 'Barnardo's'. When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The school will make use of AIM Project checklists to support the Safeguarding Team in categorising behaviour in CPOMS records and determining whether to escalate to external agencies. This is to ensure that the school's designation of sexualised behaviour is informed by the currently accepted definitions of normal, inappropriate, problematic and abusive/violent sexual behaviour. This does not limit the school's internal pastoral, educational or discipline responses which will be informed by our Pupil Wellbeing policy.

If an allegation is potentially criminal in nature, a report will be made to the Police. This will generally be in parallel to a referral to children's services. School can refer to the NPCC guidance [When to call the Police for additional support](#).

The school will also handle reports which include an online element carefully. This includes being aware of [Searching, screening and confiscation: advice for schools](#) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

The school's response to allegations of bullying is outlined in our Anti-bullying policy. Sanctions for bullying may be applied equally to perpetrators, reinforcers and bystanders who are deemed to have engaged in a joint enterprise to harm another child.

Physical hitting or otherwise using violence against another child is not tolerated at CFS. However, we recognise that inflicting physical harm on another child may be the result of under-developed language so an initial educational approach is usually taken with Lower School children, particularly those in EYFS; pupils who persist in using violence or aggression to communicate will face an appropriate sanction. When staff raise concerns about a child's propensity towards the use of physical violence towards other children, the SENDCo should also be informed as this pattern of behaviour may indicate an underlying SEND issue.

Derogatory racialised, misogynistic or homo/transphobic language is to be addressed robustly by staff. The response will be decided on a case-by-case basis in line with our behaviour policy. Depending on the age of the children and the nature of the incident, an educational approach may be taken or a sanction may be applied.

Risk assessments will be recorded electronically and will be kept under regular review.

Additional guidance is available on the NSPCC website: [Protecting children from online abuse](#)

## **18. Children at risk of Serious Violence and/or Child Criminal or Sexual Exploitation**

All staff should be aware of the indicators which may suggest a child is at risk from, or is involved with serious violent crime. These may include:

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

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or

permanently excluded from school, having experienced abuse or neglect and having been involved in offending such as theft or robbery. Additional information and advice can be found in the Home Office's [Serious Violence Duty; Preventing and reducing serious violence](#), [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

Engagement in education is a strong protective factor against children and young people's risk of involvement in serious violence. Through engaging in good quality education, children and young people feel a sense of belonging, achievement and are equipped with skills and resilience they need to be safe and to succeed in life. Our school recognises that we play a vital role in preventing and reducing serious violence by facilitating early interventions, prevention and safeguarding children.

Both child sexual exploitation and child criminal exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victims needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

Child sexual exploitation and child criminal exploitation can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Staff will understand that whilst age may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, status, and access to economic or other resources. Exploitation of this nature can be a one-off occurrence and may happen without the child's immediate knowledge e.g. through the sharing of videos or images. Please refer to the CFS policy for CSE for further information.

All staff should be aware of the indicators which may suggest a child is at risk from or experiencing child criminal or sexual exploitation. These may include:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late and are found in areas away from their home;
- are found in accommodation that they have no connection with; and
- regularly miss *school or education or do not take part in education*.

All staff will be aware that children who are involved in criminal exploitation often commit crimes themselves, therefore their vulnerability as victims is not always recognised by adults and professionals. They may still have been exploited even if the activity appears to be something they have agreed or consented to. Staff will also have an understanding of the fact that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff will be aware that child sexual exploitation is child sexual abuse. Exploitation of this nature can be a one off occurrence and may happen without the child's immediate knowledge e.g. through the sharing of videos or images. It can also affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. because they believe they are in a genuine relationship.

Our school understands that children who have been exploited or are at risk of serious violence, will need additional support to help maintain them in education. Further guidance is provided to staff in Section 1 of the Schools' Safeguarding Handbook.

## **19.Domestic Abuse and Operation Encompass**

All staff and volunteers are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The **Domestic Abuse Act 2021** recognises children as victims of Domestic Abuse in their own right and sets out statutory multi-agency responsibilities, including specific responsibilities on education providers. Amongst other things, these include how school deliver an effective PSHE / RSHE curriculum which supports children to recognise and report feelings of being unsafe, and covers the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, forced marriage, 'honour'-based abuse and FGM, and how these can affect current and future relationships.

CFS is part of **Operation Encompass**. Operation Encompass is a national police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Violence and Abuse. Operation Encompass enables every child to receive support, regardless of whether the incident has been recorded as a crime and regardless of whether there is involvement with children's services. Operation Encompass means that the police will share information with our school about all police attended Domestic Abuse incidents which involve any of our children prior to the start of the next school day.

In order to support the school's response, key members of staff have undertaken specific training related to Operation Encompass.

Our DSL and deputy DSL have undertaken recent training on Operation Encompass.

Key information about the principles of Operation Encompass is being cascaded to all other school staff and Governors. This includes discussing with staff how we can support children who are experiencing Domestic Abuse on a day-to-day basis, and particularly following an Operation Encompass notification. No actions taken by school will put the child/ren or adult victim at risk.

CFS ensures that parents are fully aware of Operation Encompass and when a new child joins our school we ensure that the parents/carers are informed about Operation Encompass.

Operation Encompass notifications, including MfH information, are stored in line with all other confidential safeguarding and child protection information as a document uploaded to CPOMS.

From March 2024 using Operation Encompass, Merseyside Police will share information with our school about all children who are or who have been missing from home or care (MfH). The Key Adult (DSL) and their deputy (SS) have completed the online Operation Encompass Key Adult training which contains a module about MfH. Information about MfH notifications have been shared with all other school staff and Governors. Our parents are fully aware that this information is being shared with our school.

Our school has discussed how we can support our children who have gone missing and how we will act following an Operation Encompass MfH notification. Our curriculum includes work in this area. We have used the Operation Encompass Handbook on MfH to inform our thinking. We are aware that we must do nothing that puts the child/ren at risk.

Operation Encompass data will form part of the termly safeguarding report to Governors. All information is anonymised for these reports.

The school has used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken.

Should the Head Teacher, DSL or DDSLs leave the school and other staff are appointed, the school will ensure that all key information is shared with the new Head Teacher/Key Adults and that the new member of staff undertakes the Operation Encompass online training.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

## 20. Online safety, data protection and the use of mobile phones and digital photographic equipment

The DfE highlights the risks of new technologies:

*'An effective approach to online safety empowers a school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:*

- **content:** *being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism*
- **contact:** *being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes*
- **conduct:** *personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and*
- **commerce:** *risks such as online gambling, inappropriate advertising, phishing and or financial scams'*

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, criminal exploitation, radicalisation and sexual abuse. Technology often provides the platform that facilitates harm.

The school's ICT & Online Safety policy clearly outlines the way in which the school uses digital technologies and there are measures in place to ensure safe, responsible and respectful use by all. This policy also includes appropriate filtering and monitoring on school devices and school networks. There is a clear code of conduct for staff and volunteers which sets out the use of digital technologies, mobile phones and personal photographic equipment around children. The school will consider, in particular, Looked after Children (Children in Care) who might be put at risk by being included in publicity materials or school photographs.

The school ensures that online safety is a running and interrelated theme when devising and implementing policies and procedures. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Staff should bring immediately to the attention of the Headteacher, Designated Safeguarding Lead or senior leadership team any behaviours by adults or children themselves that may be

risky or harmful. Staff should also report any concerns about sexting (youth produced sexual imagery or 'nudes') to the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or senior member of staff who will follow the guidance in [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (UK Council for Child Internet Safety, December 2020). This document provides clarity as to how staff should respond to these incidents.

Our Governing Body will ensure that our school has appropriate filters and monitoring systems in place and will regularly review their effectiveness. (KCSIE paragraph 141, September 2023). The school will adhere to the DfE [Meeting digital and technology standards in schools and colleges](#) which sets out that schools should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

Our school recognises that technology, and risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approach to online safety and will conduct a risk assessment which considers and reflects the risks our children face. The school will use the [360 Degree Safe](#) audit tool to self-assess the effectiveness of its policies and practice in this area.

The DfE guidance [Teaching Online Safety in Schools](#) (2023) also outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements.

Where children are asked to learn online at home, our school ensures this is done safely by referencing key guidance such as [Providing remote education: guidance for schools, Safeguarding and remote education](#) and advice from the [London Grid for Learning](#).

See the CFS ICT and Online Safety policy for detailed information about how the school protects and promotes online safety and the use of mobile phones and digital photographic equipment. Refer to the CFS Anti-bullying policy for information on the power the school has to intervene in online safety or online bullying issues amongst pupils. The CFS Data Protection policy provides detailed information about how the school protects pupils' personal data when they go online with a school-managed account.

## **21.Children requiring mental health support**

Our school recognises that it has an important role to play in supporting the mental health and wellbeing of our students. We recognise that mental health/emotional wellbeing problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The designated safeguarding lead will regularly liaise with the senior mental health (emotional wellbeing) lead where safeguarding concerns are linked to mental health to ensure there is an effective and appropriate response by school. The Emotional Wellbeing Lead (EWL), Annmarie O'Connor, works closely with the DSL and the wider safeguarding team, to support emotional wellbeing within the school community. Emotional Wellbeing issues will be represented to the SLT by the DSL, in coordination with the EWL. Additionally, from time to time the EWL will attend SLT meetings in person to present key items. Please refer to the CFS Emotional Wellbeing Policy for full information about our approach.

Within our school we adopt a whole school approach to mental health and wellbeing, which includes promoting positive mental health, wellbeing and resilience across the whole school community. The school has adopted Zones of Regulation to train children in KS1 and KS2 to identify their emotional state and adopt strategies that will help them manage their emotions

well. In KS3 and KS4 pupils are taught about mental health and emotional wellbeing in the context of the PHSME curriculum. Their learning is assessed in line with the general assessment strategy for PHSME.

Concerns around children's mental health/emotional wellbeing are shared with the safeguarding team and the EWL, through CPOMS, using the systems and processes outlined in the Emotional Wellbeing policy. Possible problems are identified, referred and responded to in a timely way. The response may include 1:1 mentoring, interventions (such as Lego therapy), reduced timetables, referral to an outside agency and support and advice for parents. Opening an EHAT may sometimes be appropriate to coordinate the various settings and agencies that are responding to the child's needs.

The school has two members of staff who are trained as mentors and other staff who can provide additional pastoral support. The Designated Safeguarding Lead works with the Emotional Wellbeing lead to triage and assign mentors to children in need of additional support with their emotional wellbeing/mental health and reviews their needs regularly. For further information about the different types of mentoring available in school, our protocols to undertake mentoring safely and the procedures for referring and monitoring pupils, see CFS Mentoring Policy, Protocols and Procedures.

We will work together with trained professionals, who will be needed in order to make a diagnosis of a mental health problem, and provide support and interventions where needed.

The school's approach to emotional well-being and resilience is guided by a range of policies and resources, including among other things the following:

- [Mental health and behaviour in schools](#)
- [Promoting children and young people's mental health and wellbeing A whole school or college approach](#)
- [Mental wellbeing | Resources | PHE School Zone](#)
- [Anna Freud](#)
- [How to Prevent Bullying | StopBullying.gov](#)

## 22. Monitoring attendance

A child missing from an education setting is a potential indicator of abuse or neglect, including exploitation. Local Authority guidance and procedures will be followed for dealing with a child who is missing from education, particularly on repeated occasions or if a child suddenly stops attending. The school will follow the pan-Merseyside missing children protocol. For those children and families who have chronic poor attendance or severe or persistent absenteeism, school will consider whether educational neglect is present and whether a referral to children's services is required, or whether the school should seek consent to begin an Early Help Assessment in order to coordinate a multi-agency plan of support for the child and family. School will ensure that our response is in line with [Working together to improve school attendance](#) DFE 2022.

Attendance is closely monitored. In line with the school's attendance policy, the attendance of children with known welfare and attendance concerns will be monitored closely, particularly those with chronic poor attendance or severe or persistent absentees, or if a child suddenly stops attending. The school also scrutinises the attendance of off-site provision to ensure children are attending and are safe. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, a child in need, are Children Looked After and/or with an EHC plan will be rigorously monitored on a daily and weekly basis. The child's social worker will be informed immediately when there are unexplained absences or attendance concerns.

Where attendance becomes a cause for concern, the school should contact the local authority school attendance team for further advice. It is important that the team, including the EWO,

school nurse and Safer Schools Officer, are made aware of any safeguarding concerns. It is critical that when a child is not attending school their welfare is confirmed and expected practice would be for an appropriate professional to visit the home and speak to the child alone, particularly if there are any safeguarding concerns. The timing for this home visit will be determined on a case by case basis. The school will seek to ensure it has at least three emergency contacts for each family and consider what urgent action it may need to take when a vulnerable child and family are not contactable and the child has not attended school. Where necessary, this may include reporting the child missing to the police. The school will ensure it is aware, in advance, of any difficulties in accessing the premises of a child's family home.

The Designated Safeguarding Lead is currently also the Designated Attendance Lead facilitating a coordinated approach to the analysis of data. Where there is cause for concern, the DSL/DAL will meet with the Head of School and (where appropriate) the SENDCo to discuss data and agree future action in respect of vulnerable children.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Where children are experiencing social, emotional or mental health issues and this is impacting on their attendance, school will refer to DFE guidance [Mental health issues affecting a pupil's attendance: guidance for schools](#).

Children Missing Education (CME) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. All staff should be aware that children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Children going missing can also be an indicator of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. When a child is deemed to be missing from education, school will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register. Once these enquiries have been undertaken, our school will follow the local protocol for Children Missing Education and make a CME referral to the Local Authority Officer for CME.

Some parents will decide to remove their child from the school roll in order to educate them at home. For the majority of children, this choice will be with the child's best education at the heart of their decision and it will be a positive learning experience. However, this is not the case for all, and home education can mean that some children become less visible to services who are there to keep them safe and supported in line with their individual needs. Where a parent or carer has expressed their intention to remove their child from the school roll with a view to educating at home, the school will work together with other key professionals and will, where possible, attempt to facilitate a meeting with the family to ensure that all parties have considered what is in the best interests of the child. This is particularly important for those children who have SEND, are vulnerable, and/or who have a social worker. The school will also link with the named officer for Elective Home Education within the Local Authority.

See CFS Attendance policy for more detailed information.

## 23. Private Fostering

The Children Act 1989, 2004 and Children (Private Arrangements for Fostering) Regulations 2005 set out that Private Fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Our school has a mandatory duty to report to the local authority if they believe a child is subject to a private fostering arrangement. (This does not include close family relatives e.g. grandparent, brother, sister, uncle or auntie.) This means making a referral to children's services. A private fostering arrangement is made without the knowledge of the local authority for the care of a child under the age of 16 years (under 18 for children with disabilities) whereby the child is in the care of someone other than their parent or close relative. Further guidance is available in Keeping Children Safe in Education (DFE, 2023) and in [Children Act 1989 private fostering](#). When a child is privately fostered a social worker must carry out an assessment to ensure the placement is appropriate and consider any support needed.

## 24. Safer recruitment

The school will ensure that all appointments follow its recruitment policy and the guidance set out in Keeping Children Safe in Education (DFE 2023). At least one member of the appointments panel will have undertaken safer recruitment training. The school will undertake all the required DFE pre-employment checks and where appropriate will record these checks on the single central record and retain evidence in personnel files. The school will seek written confirmation that third-party organisations including contractor and alternative education providers have undertaken appropriate checks. The school's Safer Recruitment Policy and Procedures set out the processes in more detail and are drawn from School Improvement Liverpool's Safeguarding Handbook.

The school is required to inform relevant staff who fall within the scope of [Disqualification under the Childcare Act 2006](#) and establish they are not disqualified. The criteria for disqualification under the 2006 Act and the 2018 Regulations includes inclusion on the Disclosure and Barring Service (DBS) Children's Barred List or committing a relevant offence.

See the CFS Safer Recruitment and Selection policy for more detailed information.

## 25. The Safeguarding Curriculum

The school will ensure it has a curriculum map which sets out how to help children keep themselves safe from harm. This will include messages which are taught through the RE/RSE curriculum, the broader PSHME curriculum and the Computing curriculum (online safety), alongside standalone pieces of work and messages delivered through other curriculum areas, as part of a broad and balanced curriculum.

Children are provided with age appropriate skills, knowledge and understanding to help them recognise and respond to issues such as consent and healthy relationships. Children will be supported to develop their understanding, at the appropriate age, of risks including: when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. The curriculum will include specific sequenced lessons to address sexual harassment, online abuse, domestic abuse, sexual violence and issues of consent in an age and stage appropriate way.

The school has adopted the Ten:Ten programme and resources to deliver the core RE and RSE curriculum throughout the school. This is supplemented by material from, among others, the NSPCC (PANTS), Defend Young Minds, Lovewise and the Naked Truth project. See the Relationships and Sex Education policy for more detailed information.

Our school recognises that a one size fits all approach may not be appropriate for all children, and a more personalised approach for more vulnerable children, victims of abuse and some SEND children may be necessary.

Children will also learn about the wider safeguarding curriculum which for children would include road safety, water safety, firework safety, knife crime, mental health, anti-bullying and know how to seek support when needed.

The school ensures the curriculum promotes an understanding of the values needed to live within a democratic society including the rule of law, and individual liberty. It will promote tolerance and respect for people of all faiths (and those of no faith), races, genders, ages, disability and sexual orientations.

## **26. Safeguarding children who attend off-site alternative provision**

When identifying that a child would benefit from attending off site provision, our school will undertake an assessment to determine that this placement is in the best interests of the child. This will normally be done by the SENDCo in consultation with the DSL and/or Head Teacher. We will ensure that the provision identified is suitable to meet the needs of that child. The school will retain responsibility for the safeguarding of any pupils we place in off-site provision. The school will undertake appropriate quality assurance checks to ensure that it is a safe place for the child to attend and will draw upon the specific guidance in the Schools' Safeguarding Handbook relating to this. If safeguarding concerns arise in the course of the quality assurance check or at any other time, the school will undertake a risk assessment and seek to mitigate the risks by appropriate measures.

The school will obtain written confirmation from the provider that the appropriate safeguarding checks have been carried out in respect of individuals working at the establishment. The school will have a formal agreement with the alternative provision and parent/carer regarding when the pupil should attend and what procedures that will be followed should the child not attend the placement.

The school will ensure it seeks the views of the young people at off-site provision to ensure they feel happy and safe. When commissioning places at alternative provision, the school will pay due regard to [Working together to improve school attendance](#), [Alternative provision – DfE Statutory Guidance](#) and [Education for children with health needs who cannot attend school – DfE Statutory Guidance](#).

Our school is responsible for the safeguarding and welfare of pupils who are educated off site. We will ensure that the appropriate coding is used within attendance registers. If we use the B code, we have confirmed that the child is attending an education provision that is supervised, and measures have been taken to safeguard the pupil. We will ensure that we have arrangements in place where the provider of the provision will notify the school of any absences. Our attendance policy will be followed in these circumstances.

See CFS Procedures for the Safeguarding of Alternative Educational Provision (AEP) for more detailed information.

## **27. Complaints and Whistleblowing**

Complaints about safeguarding should follow the school's Complaints policy.

The school recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.

*All staff should be aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues. The school's Whistleblowing Policy is there to support and aid them in these circumstances. The Local Authority also has whistleblowing procedures.*

Whistleblowing regarding the Head teacher should be made to the Chair of the Governing Body, whose contact details should be readily available to staff.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285.

## 28. Escalation

*If any member of staff is unhappy with the response they have received in relation to a safeguarding concern they have raised, it is their responsibility to ensure they escalate their concern within the organisation. All members of staff are aware of their responsibility to escalate and refer concerns on to Children's Services when it is appropriate to do so.*

Where professional disagreement occurs and the Designated Safeguarding Lead and/or Deputy are unhappy with the actions or decisions of another agency, they will escalate their concern in line with the Local Safeguarding Children Partnership's formal escalation policy to ensure a timely resolution.

The first step of any escalation process with another agency is to raise any concerns directly with the other professional and their line manager. A professionals' meeting is always a positive way of resolving differences and remaining focussed on the outcomes for the child.

## 29. Proactive Safeguarding

Our school recognises that school plays a significant part in the prevention of harm to our children by providing them with opportunities to learn, good lines of communication with trusted adults, supportive peers and an ethos of protection. As a result, safeguarding and child protection is at the heart of everything and underpins all policy and procedures within our school. We recognise that teachers and other trusted adults can offer important stability and support if a child is at risk of harm or has been or is being abused.

As a parent collaborative, we seek wherever possible to partner with parents in a supportive and transparent way to help them safeguard their children from different harms, recognising that there may be times when a different approach may need to be considered. In all circumstances, the school will put the best interests of the child at the centre of decision-making.

Our school recognises that safeguarding incidents and/or behaviours can be associated with factors outside the school or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead and deputy, should consider the context within which such incidents or behaviours occur. This is known as contextual safeguarding, or extra-familial harm, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

In order to maintain a whole school approach to safeguarding, our school community will:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to. This ethos will be modelled and replicated by staff and governors.
- Promote a caring, safe and positive environment within the school.
- Ensure that the school site is a safe, secure and welcoming place to learn and grow.
- Encourage self-esteem and self-confidence through the curriculum as well as through personal relationships, whilst not condoning aggression or bullying.
- Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, etc.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.

- Include safeguarding messages across the full curriculum, including RSE/PSHME, to ensure that the children are equipped with the skills they need to recognise risky behaviours, stay safe from harm and to know to whom they should turn for help. In particular this will include staying safe online, anti-bullying, e-safety, road safety, focused work in Year 4 and Y8 to prepare for transition to Middle and Upper School. For secondary age pupils, there will more safeguarding messages about personal safety when travelling independently, issues around consent, sexting, positive mental health, etc.
- Offer a positive school experience.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Ensure that all staff, volunteers, governors, policies and procedures operate with the best interests of the child at their heart.
- Publish a weekly 'Watch with Care' list to alert all staff to children who are in particular need of additional support or careful oversight.

### **30. Monitoring and Quality Assurance**

Policies and procedures only remain effective if they are regularly monitored and reviewed to ensure that they are still applicable and relevant. Our school and its governors recognise the importance of monitoring and quality assuring the effectiveness of our child protection (safeguarding) policy and the procedures set out within it. The aim of monitoring and evaluating the child protection (safeguarding) policy is to learn from practical experience, which will contribute to inform policy reviews and future changes to the policy and procedures. The process of monitoring and quality assurance will help the school and governors to identify the policy strengths and weaknesses, and will help to provide an understanding of the reasons for these, so that decisions can be made to resolve any limitations with immediate effect.

Monitoring and evaluation will be done by checking whether the standards from the child protection (safeguarding) policy are implemented and whether safeguards are working; this will be undertaken throughout the year by the Designated Safeguarding Lead/Headteacher, the Governor with responsibility for Safeguarding and the Chair of Governors. Activities which form part of the ongoing monitoring of effectiveness are:

- Scrutiny of the Single Central Record and personnel files to ensure pre-employment checks are robust and up-to-date, and that job descriptions for new positions include reference to child protection, etc.
- Scrutiny of the school's annual 175 safeguarding audit by the Chair of Governors and Link Governor for Safeguarding, alongside the full governing body having oversight of any actions arising from the audit.
- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, pupils taken off roll, the views and progress and participation of vulnerable students. In particular, the school will monitor the link between attendance and safeguarding and those persistently absent, frequently late, missing school (including part of the school day) or those who suddenly stop attending.
- Regular scrutiny by Governors of data arising from these analyses.
- Regular meetings of the Safeguarding team to review actions and the effectiveness of policies and procedures.
- Using 'questionnaires' to evidence the effectiveness of staff training and staff understanding of key safeguarding topics and if Part 1 of Keeping Children Safe in Education.
- Opportunities for staff and volunteers to discuss safeguarding and child protection at staff training sessions and INSET days.

- Confirmation that training has been undertaken according to planned schedule and that all relevant staff and volunteers have participated.
- Pupil voice focus groups, Student Council meetings and questionnaires which include the opportunity to discuss safeguarding and child protection issues.
- Safeguarding learning walks designed to evidence and test out key safeguarding standards.
- Adapting and amending the policy and procedures outside of their annual review date to reflect current issues which may have recently arisen in order to ensure that all children are protected at all times.

Our school will also draw upon additional quality assurance activities and templates referenced within the School Improvement Liverpool Schools Safeguarding Handbook e.g. Single Central Record Checklist, Personnel Record Checklist and the Headteacher's Quality Assurance Checklist.

The school's safeguarding work will be inspected by ISI.

### **31. Safeguarding in EYFS**

Most procedures and information related to safeguarding in EYFS are covered within this or related policies, such as the ICT and Online Safety policy which sets out the protocols for using mobile phones to photograph children

Most staff working in Reception hold a current Paediatric First Aid certificate. A register of who holds one and details of when they need to be renewed is kept by the school administrator Deborah Tran.

Each child is allocated a key person who ensures that the care of the child is tailored to their needs. A list of key people is also shared with the EYFS Lead for Safeguarding.

All staff working in Reception are made aware of the CFS Child Collection and Missing Child policy which are particularly pertinent for EYFS pupils.

Parents are encouraged that they can talk to staff when dropping off their children at school. For times when staff need to talk to parents confidentially, a quiet area can be provided in the intervention/meeting room or (by appointment) in the ALPS room.

EYFS staff who have a safeguarding concern about a child should report it through CPOMS and discuss the most appropriate approach with the Designated Safeguarding Lead.

# Annex A - useful links to national guidance and advice

## Toolkits

- [STAR SEND Toolkit | Childnet](#) equips educators with the knowledge they need to support young people with special educational needs and disabilities.
- Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB. [Preventing harmful sexual behaviour in children - Stop It Now](#)
- NSPCC - Harmful sexual behaviour framework An evidence-informed framework for children and young people displaying HSB. [Harmful sexual behaviour \(HSB\) framework and audit](#)

## Guidance, advice and support

**Keeping children safe in education 2023** [Keeping children safe in education 2023 - GOV.UK](#)

### Abuse

- DfE advice [What to do if you're worried a child is being abused - GOV.UK](#)
- Domestic and relationship abuse: Various Information/Guidance - Home Office (HO) [Domestic abuse: how to get help - GOV.UK](#) and related documents linked on that page
- Faith based abuse - DfE advice [National action plan to tackle child abuse linked to faith or belief - GOV.UK](#)
- Together we can stop child sexual abuse – HM Government campaign [Stop Abuse Together](#).

### Attendance

- [Working together to improve school attendance \(applies from 19 August 2024\)](#)

### Bullying

- Preventing bullying including cyberbullying - DfE advice [Preventing and tackling bullying - GOV.UK](#)

### Children missing from education

- Children missing education - DfE statutory guidance [Children Missing Education Statutory Guidance for Local Authorities September 2016](#)

### Child Exploitation

- Trafficking: safeguarding children - DfE and HO guidance [Safeguarding children who may have been trafficked](#)
- Care of unaccompanied and trafficked children – DfE statutory guidance [Care of unaccompanied migrant children and child victims of modern slavery: Statutory guidance for local authorities](#)
- Modern slavery: how to identify and support victims – HO statutory guidance [Modern slavery - GOV.UK](#)

### Disqualification under the Childcare Act 2006

- [Disqualification under the Childcare Act 2006 - GOV.UK](#)

### (So called) “Honour Based Abuse” including FGM and forced marriage

- Female genital mutilation: information and resources- Home Office guidance [Female](#)

[genital mutilation - GOV.UK](#)

- Female genital mutilation: multi agency statutory guidance - DfE, DH, and HO statutory guidance [Multi-agency statutory guidance on female genital mutilation - GOV.UK](#)
- Forced marriage - Forced Marriage Unit (FMU) statutory guidance [Forced marriage - GOV.UK](#)
- FGM resource pack – HM Government guidance [Female genital mutilation: resource pack - GOV.UK](#)

### **Health and Well-being**

- Fabricated or induced illness: safeguarding children - DfE, DH, HO [Overview - Fabricated or induced illness - NHS](#)
- Rise Above: Free PSHE resources on health, wellbeing and resilience - Public Health England [Every Mind Matters](#)
- Medical-conditions: supporting pupils at school - DfE statutory guidance [Supporting pupils at school with medical conditions - GOV.UK](#)
- Mental health and behaviour - DfE advice [Mental health and behaviour in schools - GOV.UK](#)

### **Private fostering**

- Private fostering: local authorities - DfE statutory guidance 142 [Replacement Children Act 1989 Guidance on Private Fostering - GOV.UK](#)

### **Radicalisation**

- Prevent duty guidance- Home Office guidance [Prevent duty guidance - GOV.UK](#)
- Prevent duty: additional advice for schools and childcare providers - DfE advice [Protecting children from radicalisation: the prevent duty - GOV.UK](#)
- [The Prevent duty - Departmental advice for schools and childcare providers June 2015](#)
- Prevent The use of social media for online radicalisation July 2015 [How social media is used to encourage travel to Syria and Iraq - gov.uk](#)
- Educate Against Hate website - DfE and Home Office advice [Educate Against Hate](#)

### **Relationships and Sex Education**

- Statutory Guidance [Relationships and sex education \(RSE\) and health education - GOV.UK](#)

### **Violence**

- Ending violence against women and girls 2016-2020 strategy - Home Office [Tackling violence against women and girls](#)
- Violence against women and girls: national statement of expectations for victims - Home Office guidance [Violence Against Women and Girls National Statement of Expectations - GOV.UK](#)
- Sexual violence and sexual harassment between children in schools and colleges DfE advice now found in KCSIE
- Liverpool multi-agency guidance for staff working with adults and families living with Domestic Abuse [Domestic abuse and violence - Liverpool City Council](#).

### **Working Together**

- Statutory guidance 2023: [Working Together to Safeguard Children 2023 - GOV.UK](#)