

KWS Educational

Safeguarding and Child Protection Policy

Version 6 June 2020

Approved by the Trustees

Review 1 year from date of approval.

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## **Safeguarding And Child Protection Policy**

***It is the statutory duty of both the police and Children' Services department of all the local authorities we work with to investigate suspected child abuse, and most investigations are now carried out by multi agency approach. However, all professionals working with young people have a responsibility to protect them from abuse by close liaison and co-operation with the statutory authorities.***

### **Education Services**

All those working in the education services can contribute to the safeguarding of children and child protection processes. All schools and colleges have a pastoral responsibility towards their students. They can play a part in the prevention of abuse and neglect, through their own policies and procedures for safeguarding children, and through the curriculum. All schools and colleges should create and maintain a safe environment for children and young people, and should be able to manage situations where there are child welfare concerns. Children can be helped to understand what is and is not acceptable behaviour towards them, and taught about staying safe from harm, and how to speak up if they have worries or concerns. The curriculum can also play a preventive role in developing awareness and resilience and in preparing children and young people for their future responsibilities as adults, parents and citizens.

Through their day to day contact with students, and direct work with families, education staff have a crucial role to play in noticing indicators of possible abuse or neglect, and in referring concerns to the appropriate agency, normally the social services department. When a child has special educational needs, or is disabled, schools will have important information about the child's level of understanding and the most effective means of communicating with the child. They will also be well placed to give a view on the impact of treatment or intervention on the child's care or behaviour. Staff working in the education service will on occasions be asked by a social services department for information on a child about whom there are concerns about abuse or neglect. The education service itself does not have a direct investigative responsibility in child protection work, but schools and other maintained establishments have a role in assisting the social services department by referring concerns and providing information for s.47 child protection enquiries. Where a child of school age is the subject of an inter-agency child protection plan, the school should be involved in the preparation of the plan. The school's role and responsibilities in contributing to actions to safeguard the child, and promote his or her welfare, should be clearly identified.

Throughout the education service all staff should be alert to the signs of abuse and neglect, and know to whom they should report concerns or suspicions; all schools and colleges should have a designated member of staff with knowledge and skills in recognising and acting upon child protection concerns. He or she should act as a source of expertise and advice, and is responsible for co-ordinating action within the institution and liaising with other agencies; all schools and colleges should be aware of the safe guarding procedures within each local authority.

## OVERALL AIMS

This policy will contribute to safeguarding our children and promoting their welfare by:

- Clarifying standards of behaviour for staff and children
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values
- Creating an organisational culture that is safe for children, both in school, in the wider community and online
- Building links with families and other agencies which consider contextual safeguarding
- Introducing appropriate work within the curriculum
- Developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns
- Addressing concerns at the earliest possible stage in the least intrusive way

## KEY PRINCIPLES

- Always consider the child first and what life is like for that child, maintaining a culture of vigilance for their lives both on school and out of school
- Provide support and intervention at the earliest possible opportunity in the least intrusive way in accordance with LSCB Thresholds Framework
- Have conversations, build relationships and maintain professional curiosity
- Focus on securing improved outcomes for children
- Build a culture of openness and transparency where all staff are able to demonstrate an understanding of their role and their responsibility to safeguard and promote the welfare of children
- Every child is entitled to a rich and rounded curriculum
- When issues arise, the Designated Safeguarding Lead (DSL) should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with inter-agency procedures

## What is Child Abuse?

Child abuse is defined in the DfCSF guidance, '*What to do if you're worried a child is being abused.*' as follows:

**Abuse and neglect are forms of maltreatment- a person may abuse and neglect a child by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in the family home or in an institutional or community setting; by those known to them or, more rarely, by a stranger.**

It is to be noted that KWS supports mainly children and young people with SEN and disabilities, research shows that children from these backgrounds, along with those children who are looked after or previously looked after, have an added vulnerability and are more likely to suffer from abuse or harm.

The four main categories of abuse are:

- **Physical Abuse**  
May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child they are looking after. This situation is commonly described using such terms as factitious illness by proxy or Munchausen syndrome by proxy.
- **Emotional Abuse**  
The persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed upon children. It may involve causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.
- **Sexual Abuse**  
Involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- **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. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In addition, it should be noted that the alleged perpetrator may also be a child. **Peer on Peer Abuse** is where child abuse is alleged to have been carried out by another child; the safeguarding procedures are to be adhered to for both the victim and the alleged abuser. Where peer on peer abuse is occurring, we may see: torn clothing; physical injury such as bruises, cuts, scratches without a natural explanation; loss of money or damaged property; unwillingness to go to school; change in eating habits; moody outbursts or withdrawn behaviour.

For further information on Peer on Peer Abuse, and other specific vulnerabilities and types of abuse see **Appendix 1**, and in addition refer to *Keeping Children Safe in Education (2019)*.

In order to best support our young people and report any concerns, we need to be aware of the **potential signs of abuse**, below are some indicators of abuse, though the lists given are not exhaustive:

## **Potential Signs of Abuse**

### **Some Signs of Possible Physical Abuse:**

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- Inconsistent accounts for the cause of injuries
- Frozen watchfulness
- Apparent discomfort when moving/sitting/standing

### **Some Signs of Possible Emotional Abuse:**

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

### **Some Signs of Possible Sexual Abuse:**

- Any allegations made by a child concerning sexual abuse
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- Sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia
- Apparent discomfort when walking or sitting

### **Some Signs of Possible Neglect:**

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food

## **What KWS do to Help Prevent Abuse?**

KWS is pro-active in preventing abuse of its students and in ensuring that all students are fully equipped to recognise the signs of abuse and exploitation. This is developed through a thorough and diverse scheme of PSHCE, individual keywork sessions, outside bodies attending KWS such as police, school nurse, drug and alcohol services, sexual health services, and **LSCB approved drama productions addressing current trends and issues**. Liaison with parents, carers and other professionals where required is also very valuable. KWS has set behavioural expectations for all children which ensure we encourage and celebrate the school's diversity. Classes are divided vertically to ensure there is not a hierarchical system within school that can occur when classes are streamed. Due to the nature of KWS School, the number of, and the particular students which we support, there are not any times where the children are not monitored by staff, there are no free times such as break and lunch as these are shared with all staff.

## **Involving Parents and Carers**

In general, we will discuss any safeguarding and child protection concerns with parents/carers before approaching other agencies, and will seek their consent when making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the Designated Safeguarding Lead. However, there may be occasions when the school will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child. Parents/carers will be informed about our safeguarding policy through the school website [www.kwseducational.co.uk](http://www.kwseducational.co.uk) and further updates via letter.

## **Role of the Designated Safeguarding Lead (DSL)**

The KWS School Designated Safeguarding Lead (DSL) is the first point of contact for anyone who has a concern about the safety and well-being of a student or member of staff. The DSL does not need to be a member of the teaching staff but should be a recognised member of the Senior Management Team, and have the required status and authority to carry out the requirements of the role. Depending on the size and requirements of the school a Deputy Designated Safeguarding Lead should be available. The deputy is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a child/young person's needs.

The DSL and Deputy DSL are required to undertake safeguarding level 2 child protection training every year and should supplement this training by attending a 2-day workshop which is provided by Bedfordshire Safeguarding Children Board every 2 years. The DSL and Deputy DSL will support any another KWS sites when dealing with child protection concerns.

Requirements:

- To have the skills and ability to identify signs of abuse as described in the Keeping Children Safe in Education 2019 document.
- To know how to refer concerns to the appropriate investigating agencies.
- Maintain detailed and accurate written records of child protection concerns and ensure they are kept securely.

- Offer support, advice and give a level of expertise to all members of the school staff team - safeguarding and child protection training is part of the induction for all new staff in the school and that they are also linked into any relevant training.
- Ensure that all staff have access to and understand the school Safeguarding and Child Protection Policy and the individual LA's Child Protection Procedures.
- Be responsible with the Head teacher for the annual review and update of the School Safeguarding and Child Protection Policy and the presentation of this to the Board of Trustees.
- Ensure that a copy of the KWS Safeguarding and Child Protection Policy is available for any parents who request to see it. This is kept on the website, and a paper copy in the school office.
- Contribute to the Child Protection Conference and Core Group processes by either attending or ensuring the relevant member of staff attends. Provide written reports as required in an appropriate and timely manner.
- Ensure that the board of Trustees and staff where appropriate are updated on a regular basis about all issues and child protection investigations.
- Ensure that relevant safeguarding files are copied and forwarded appropriately when a child/young person transfers to another school.
- Be part of the team who review and monitor any causes of concern relating to students
- Routinely review safeguarding policies and procedures, not only in a timely manner to meet legal requirements, but also in reaction to external events, such as national emergencies which may require alterations to school provision or school closure (see addendums)

### **Role of all Staff**

- To demonstrate a commitment to safeguard the welfare of all students.
- To implement KWS's policies and procedures, especially those relating to safeguarding and staff conduct, behaviour, data protection and confidentiality.
- To attend Safeguarding training as part of an induction programme and yearly thereafter
- To have the skills and develop the skills to identify signs of abuse.
- To liaise with the DSL (deputy DSL where DSL is absent) to record safeguarding incidents, and action as required.

### **Visitors**

- Visitors to show ID to staff on arrival.
- Visitors may not attend unless with prior knowledge of a scheduled event.
- Visitors to be signed into the visitors' book.
- Visitors to be escorted by a member of KWS staff whilst on site.
- Visitors to be alerted to any current issues, or housekeeping.
- Visitors to be signed out on leaving.
- Visitors have the right to make complaint regarding any part of KWS that they feel is unsatisfactory. Details of procedure in visitors' book and on website.

## **Trustees**

- Ensure that they comply with their duties under legislation. They will have regard to Keeping Children Safe in Education 2019 to ensure that the policies, procedures and training in our school are effective and comply with the law at all times. Trustees act as the guardians of the school and have a duty to ensure that all regulations are adhered to as stated in the Education Act 2002.
- Trustees form part of the Safer Recruitment policy and ensure that this is upheld by forming recruitment panels.
- Trustees ensure the Designated Safeguarding Lead maintains management oversight of any work undertaken by the Deputy Designated Safeguarding Lead.
- Trustees ensure all training requirements are met for staff and volunteers.

## **Safer School Culture**

- The culture of this school is one that is safe for children and unsafe for adults that may pose a risk to children. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Designated Safeguarding Lead whether they relate to child or an adult
- The school has a culture of listening to, and hearing the voice of the child
- The school views its responsibility to create a safer culture for students as one that includes times when they may be absent from school, either through illness or school closure.

## **Safer Recruitment and Selection**

- The school pays full regard to 'Keeping Children Safe in Education' (DfE 2019). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS) and prohibition order checks in relation to qualified teachers and section 128 Directions in relation to management of Independent schools.
- All recruitment materials will include reference to the school's commitment to safeguarding and promoting the well-being of children
- Sarah Nichols-Weaver, Louise Shreeves, Susannah King, Magdalena Nichols and Karl Weaver have undertaken Safer Recruitment training. One of the above will be involved in all staff/volunteer recruitment processes and sit on the recruitment panel.



## **Children with Additional Needs**

KWS recognises that while all children have a right to be safe, some children may be more vulnerable to abuse, for example those with a disability or special educational need, LAC, previously LAC, privately fostered (see below \*), those living with domestic violence or drug / alcohol abusing parents, etc.

\* when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity). There is a mandatory duty to inform the local authority of children living under these arrangements.

## **Reporting and Recording Procedures at KWS:**

Any member of staff, volunteer or visitor who suspects that a child is or has been abused in any way must immediately report this to the DSL either in person, over the phone or via SchoolPod. It is imperative that such suspicions are always shared, as all pieces of the jigsaw are needed to help to create the full picture.

The procedure below must be followed for reporting and recording all concerns:

1. Young Person shares information or discloses, or a concern is raised.
2. If RED then DSL is informed immediately before recording. If AMBER or GREEN go to step 3 (see **Appendix 2** for RAG Guidelines)
3. Concern is logged onto SchoolPod (by the reporting adult)
4. SchoolPod automatically generates an e-mail to the DSL
5. DSL reviews the concern raised.
6. DSL decides course of action and liaises with reporting adult/other staff as necessary.

**RED** Immediate referral to police and or social care, families informed as appropriate

**AMBER** Discuss with other agencies involved and escalate to social care, families informed as appropriate

**GREEN** Record and discuss with parents and at team meetings as appropriate. Monitor and escalate to amber or red if persistent.

## **Confidentiality of Disclosures:**

Some young people may seek to tell staff, in confidence, that they have been abused. Staff must understand that it is not possible to give young people absolute guarantees of confidentiality because that could put staff in the untenable position of being unable to protect the young person. It is good general childcare practice to resist being drawn into secretive and collusive relationships with young people. It is especially important for young people who may have been abused that the destructive element of secrecy is not reinforced. It is essential that a relationship is built up between young people and staff

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such that young people feel that they can trust staff to do the best thing for them if they say they have suffered abuse.

**Do not offer a guarantee of confidentiality but reassure him/her that the information given will be used in their best interests and tell the young person what may happen next.**

## **Handing a Disclosure**

When a young person tells you about abuse s/he has experienced please follow the guidance below.

- Stay calm.
- Do not be wary of what they young person may tell you.
- Do not communicate in anyway shock, anger or embarrassment.
- Reassure the young person stating you are pleased that they are speaking with you.
- Never enter into a pact of secrecy. Assure him/her that you are there to help but that you will have to share information in order to do so. Advise him/her who you will pass this onto and why.
- Tell them that you believe them

## **Exclusions:**

When the school is considering excluding (either fixed term or permanently) a vulnerable child and/or a child who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment must be completed prior to convening a meeting of the Trustees.

## **Risk Assessments:**

All students have a risk assessment which outlines the potential risks they pose to themselves and others, the behaviours they may display and the strategies staff can implement to minimise and manage the risks. These risk assessments are reviewed and updated at least half-termly, and can be found in the Health & Safety folder on DropBox and also on SchoolPod.

The school also completes risk assessments in circumstances where daily contact with the students may not be possible, for example, school closure or long-term illness. At these times, as with all others, the safety of the child is paramount and needs to be monitored, and concerns recorded, following the usual safeguarding procedures.

## **Attendance:**

Registers are taken twice a day and records are kept securely. Student attendance is monitored daily, with calls immediately being made to the family and/or social worker when a student is unexpectedly absent. Where it is a known absence for medical reasons, evidence is required. KWS has close liaison with Education Welfare and ongoing concerns are worked jointly.

Please refer to our Attendance Policy and Data Protection policy for further information.

## **Absconding from School:**

If a young person absconds from school, the procedures to follow are outlined in the student's risk assessment, and are personalised to ensure that the right actions are taken for that particular student in order to optimise their return to safety. The maximum time delay prior to calling 101 is the recommended 10 minutes, however the personalised procedures to follow should a student leave our site are outlined in the risk assessments, and are based on that particular student's vulnerabilities and previously identified risks.

## **Site Safeguarding:**

All areas of our site are secure and access to our buildings is via key only. Upon arrival in school the students are met at the building entrances and observed going in to registration. All equipment is monitored and reviewed for student safety.

Please refer to our Attendance Policy, Visitor Policy and Health and Safety Policy for further information.

## **Staff Safeguarding:**

All staff at KWS are employed via safer recruitment procedures and our SCR is maintained robustly. Staff integrity is paramount to supporting our students as best we can, and so all staff adhere to our code of conduct.

Please refer to our Safer Recruitment Policy; Data Protection Policy, Staff Code of Conduct, Complaints Policy and Whistleblowing Policy for further information.

### *Responding To An Allegation Or Concern About A Member Of Staff*

The school will comply with the LSCB procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances. This procedure should be used in any case in which it is alleged that a member of staff, trustee, visiting professional or volunteer 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 in a way that indicates s/he may pose a risk of harm to children**

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children.

All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

Allegations or concerns about colleagues and visitors must be reported directly to the DSL, unless the concern relates to the DSL in which case it should be reported to the Headteacher. In addition, concerns can be reported directly to the Local Authority Designated Officer (LADO) in children's social care, who will liaise with the Chair of Trustees and they will decide on any action required.

If the DSL (or Head Teacher) is not available the member of staff should report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns. Contact into the LADO (see **Appendix 3**) should happen at the earliest possible opportunity and within 1 working day.

- The LADO may request a referral, if this is requested the referral will be completed and submitted within 1 working day
- The school will engage with the LADO at all stages of the management of the allegation / concern and comply with the Statutory Guidance contained within Keeping Children Safe in Education (2018) and the local procedures published by the LSCB. In this regard, the school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered. Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.
- Should the school dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with Statutory Duty a referral to the Disclosure and Barring Service will be made. If the member of staff is a qualified teacher, the school will in accordance with published guidance from the Department for Education consider whether a referral to the National College of Teaching and Leadership (NCTL) should be made.

The school will adhere to the Statutory Guidance contained within Keeping Children Safe in Education (2018) with regard to record keeping, references and compromise or settlement agreements.

## **Virtual School Headteachers**

KWS has a number of Looked After Children in its care from each of the LA's we support. We work closely with the Virtual School heads and their teams whose role is to lead, support and challenge KWS head teachers, designated teachers, Council's Looked after Children Service and other personnel to secure the best possible educational provision and outcomes for children and young people in the care of the Council. Looked After Children are also monitored through the Welfare Calls System.

Please refer to our LAC/PLAC Policy for further information.

## **Early Help**

The basis of this procedure is to ensure that early help is sought, taking action early and as soon as possible to tackle problems emerging for children, young people and their families. Effective help can occur at any point in a child or young person's life. At KWS this refers to ensuring the monitoring of all students via our RAG system and alerting and involving other professionals and parents from the onset to ensure best outcomes for students.

## **Multi Agency Work** (see **Appendix 3** for useful contacts)

- We work in partnership with other agencies in the best interests of the children. The school will, where necessary, liaise with the school nurse, initiate an Early Help Assessment, and make referrals to children's social care. Referrals and contacts should be made by the Designated Safeguarding Lead to Multi Agency Safeguarding Hub (MASH) for the Local Authority where the child resides, depending on the level of need. Where the child already has a social worker, the request for service will go immediately to the social worker involved, or in their absence to their team manager or Duty Worker.
- We will co-operate with any child protection enquiries conducted by children's social care: the school will ensure representation at appropriate inter-agency meetings such as team around the family meetings, initial and review child protection conferences, together with core group meetings.
- We will provide reports as required for these meetings in accordance with the LSCB interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.
- Where a child is subject to an inter-agency child protection plan, child in need plan or early help assessment, the school will contribute to the preparation, implementation and review of the plan as appropriate.
- If a child is subject to a referral to a multi-agency safeguarding panel such as MARAC, MAGPAN OR CHANNEL the school will contribute to such arrangements

## **Further Guidance**

- KWS has procedures for handling suspected cases of abuse, including procedures to be followed if a member of staff is accused of abuse; see also the whistle-blowing policy and the complaints policy.
- KWS staff with designated responsibility for safeguarding receive appropriate training which is updated at a minimum of every year with specific DSL training every 2 years
- All KWS staff and volunteers undertake safeguarding training at induction and annually thereafter
- KWS use the LA school health service in promoting and maintaining the health of school children and in safeguarding and promoting their welfare' this is facilitated by the school nurses, details are found on the school notice board.
- KWS trustees should exercise their safeguarding responsibilities, in particular in response to allegations against head teachers, and in ensuring that there are school safeguarding policies in place; named trustee for safeguarding is Magdalena Nichols.
- KWS has an effective whole school policy against bullying and measures in place to prevent all forms of bullying among students. Please see the KWS policy on preventing bullying and DfES guidance "Preventing and Tackling Bullying" - July 2017.
- Where KWS is concerned that a child may have 'disappeared', or about any aspect of a student transfer which gives rise to concerns about a child's welfare, such as FGM, HBV, FM CSE and its Prevent Duty. These should be reported to the LA, LADO and in the case of Prevent to the police designated team for missing persons and CSEG, MARAC and SERAC panels. Please note that it is a mandatory duty for teachers to report disclosures of FGM about females under the age of 18.

## **APPENDIX 1**

### **Safeguarding in Specific Circumstances: Children who are Vulnerable to Extremism**

- KWS seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- In accordance with the Prevent Duty placed upon the school by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism. KWS is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- KWS *values* freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to this school is fundamental British values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and the rights of all Women and Men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.

#### *Risk reduction*

- KWS Trustees, the Head Teacher and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of children by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy. In addition, the school Prevent Action Plan template may be used to demonstrate how the organisation is fulfilling the prevent duty.
- This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local safeguarding children board.
- In accordance with the Prevent Duty, Sarah Nichols-Weaver is the Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.
- When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person. If a child or Young Person is thought to be at risk of radicalisation, advice will be sought from the Early Help Hub, and if advised, information will be shared with the Channel Panel using the Early Help Assessment form
- In all cases, in accordance with advice provided from the Early Help services of the resident Local Authority the school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalisation
- If the school are concerned that a child may be at risk of significant harm in relation to radicalisation or involvement in violent extremism a child protection referral will be made to the Multi Agency Safeguarding Hub.

## **Safeguarding Children in Specific Circumstances: Sexualised Behaviours**

- Where children display sexualised behaviours, the behaviours will be considered in accordance with the children's developmental understanding, age and impact on the alleged victim. Tools such as Brook Traffic Light Tool will be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child/ren receive the right support at the right time either via an Early Help response or referral to Children's Social Care for the LA the child resides in.
- In all cases of peer on peer abuse, including verbal (spoken), physical (assault, upskirting), emotional (taunting, exclusion) the school will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response consistent with the LSCB Thresholds Framework.
- Where necessary, the school behaviour policies will be invoked and any sanctions applied will be consistent with these procedures
- Where issues indicate that a criminal offence may have been committed a report will be made to the police

## **Safeguarding Children in Specific Circumstances: Youth Violence and County Lines**

- The school recognises the risks posed to children in relation to involvement in gang related activity which may be street gang, peer group or organised crime. Young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of an initiation or hazing practices.
- The school understands that Early Help can be crucial in the early identification of children who may need additional support due to gang related activity and as such will provide an early help response when concerns are raised about indicators of gang activity
- If, however information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made to the Multi Agency Safeguarding Hub within Children's Social Care.
- Where there are concerns that a child or young person may be, or is at risk of becoming involved in gang related activity, a referral will be made to the MAG panel in accordance with Local procedures as part of the safeguarding response

## **Safeguarding Children in Specific Circumstances: Youth-Generated Sexualised Imagery**

- The school recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the UK Council for Child Internet Safety in relation to how we respond to incidents.
- In all cases where an incident of youth produced sexual imagery is reporting the following actions will be undertaken:
  - The incident should be reported to the Designated Safeguarding Lead as soon as possible.
  - The Designated Safeguarding Lead should hold an initial review discussion or meeting with appropriate school staff.
  - There should be subsequent interviews with the young people involved (if appropriate).



- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
- An immediate referral will be made to the Police and Social care in the following circumstances:
  - The incident involves an adult
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
  - The imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - The imagery involves sexual acts and any student in the imagery is under 13
  - There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming
- If none of the above applies the school may choose to deal with the incident without involving the police or social care. This will usually be the case where the Designated Safeguarding Lead is confident that they have enough information to assess the risks to the students involved and the risks can be managed within the school pastoral support and disciplinary framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren
- The school will pay due regard to the Department for Education guidance: Searching, Screening and Confiscation advice
- Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the designated safeguarding lead will respond to an incident based on what they have been told about the imagery.
- All incidents will be recorded.

### **Safeguarding Children in Specific Circumstances: Child Criminal Exploitation**

- The criminal exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing, and/or others performing on them, sexual activities (sexual exploitation) or for transporting goods/money etc.. or performing other tasks that are criminal (criminal exploitation).
- Child exploitation can occur through use of technology without the child's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability
- The school recognises that both boys and girls can be vulnerable to Child Criminal Exploitation and as such ensure staff are alert to signs and indicators

- The school recognises that there are various 'models' of CCE which include but not limited to:
 

Gangs, County Lines and groups	Boyfriend/Girlfriend model
Peer on Peer	Familial
Online	Abuse of authority
- Where concerns are identified in relation to Child Sexual and Criminal Exploitation the LSCB thresholds framework will be consulted in order to ensure the child receives support at the earliest possible opportunity.
- An Early Help multi agency response may be initiated by completing an Early Help Assessment form and engaging with the Early Help Hub or Stronger family's team. Where parental consent cannot be obtained, advice will be sought from the Early Help Hub
- If a child is thought to be at risk of significant harm through child sexual exploitation a referral will be made to the Multi Agency Safeguarding Hub within children's social care.
- In all cases intelligence will be shared with Bedfordshire Police using the intelligence form which will also be copied to the Single Point Of Contact for CCE within each local authority.

### **Safeguarding Children in Specific Circumstances: Female Genital Mutilation / Forced Marriage / Modern Day Slavery**

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.
- FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this.
- Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the school's safeguarding reporting procedures.
- Those failing to report such cases will face disciplinary sanctions.
- If the school are concerned that a child / young person has experienced or is at risk of FGM a Child Protection referral will be made to the Multi Agency Safeguarding Hub in accordance with interagency procedures produced by the LSCB. In addition, all teachers will follow mandatory reporting duties.
- Further information regarding FGM can be found in Appendix five
- A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights
- The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.
- The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry This includes:
  - Taking someone overseas to force them to marry (whether or not the forced marriage takes place)

- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order
- Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the of which comes from the Palermo Protocol).
- These crimes include holding a person in a position of slavery , servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.  
Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

### **Safeguarding Children in Specific Circumstances: Human Trafficking**

There are several broad categories of exploitation linked to human trafficking, including:

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
- Forced marriage and illegal adoption (if other constituent elements are present)

Further guidance in relation to safeguarding children in **SPECIFIC CIRCUMSTANCES** can be located in the Safeguarding Children Board and the Local Authority procedures as listed below:

- Abuse Linked to Spiritual Belief
- Child Sexual Exploitation
- Child Criminal Exploitation
- Safeguarding Children vulnerable to Gang Activity
- Supporting individuals vulnerable to violent extremism
- Private Fostering
- Children missing from home or care
- Children missing education
- Children of Parents who Misuse Substances
- Children of Parents with Learning Difficulties
- [Working](#) with parents/carers with mental health problems
- Working with parents/carers with disabilities
- Disabled Children
- Protocol for dealing with domestic violence when children are involved
- Online – Children Exposed to Abuse through the Digital Media
- Fabricated or Induced Illness
- Female Genital Mutilation
- [Forced Marriage](#) / Honour Based Violence
- Practice Guidance & Procedures to distinguish between healthy and abusive sexual behaviours in children and young people
- Safeguarding children who may have been trafficked
- Protocol & Guidance; Working with Sexually Active Young People

- o Working with hostile, non-compliant clients and those who use disguised compliance

## **APPENDIX 2**

### **Safeguarding Policy RAG (red, amber, green) Indicators**

This table is not an exhaustive list and provides a guidance on the kinds of behaviours and situations that would fall into a particular category. Remember that all situations are complex and you must refer to the Designated Lead for Safeguarding or in their absence the deputy Designated Lead.

	<b>RED</b>	<b>AMBER</b>	<b>GREEN</b>
Risk Level	Young person appears to be at risk of immediate and or serious harm.	Young person at risk of harm, but not imminent and possibly less serious.	Concerns about the well-being of a young person, which if not acted upon would lead to poor outcomes.
Response	Immediate referral to outside agency.	Referral to outside agency within 1 day.	Monitor and discuss and record within staff meeting.
Examples	<ul style="list-style-type: none"> <li>• Domestic violence (level 4 Barnardos Scale)</li> <li>• Child trafficking.</li> <li>• Likely to be at risk of physical assault if returned to home.</li> <li>• At risk of physical assault.</li> <li>• CSE.</li> <li>• Vulnerable child left alone.</li> <li>• Serious self-harm.</li> <li>• Fails to enter school having left home.</li> </ul>	<ul style="list-style-type: none"> <li>• Domestic violence (level 3 Barnardos Scale)</li> <li>• Child regularly dirty and inappropriate clothing.</li> <li>• Inappropriate sexualised behaviour.</li> <li>• Emotional neglect.</li> <li>• Substance misuse by young person.</li> <li>• Substance misuse by parents.</li> </ul>	<ul style="list-style-type: none"> <li>• Domestic violence (level 1 and 2 Barnardos scale)</li> <li>• Child missing education.</li> <li>• Young person has caring responsibilities.</li> <li>• Behavioural difficulties in school.</li> <li>• ASB or associating with criminally active peers.</li> <li>• Non-arrival at school and cannot contact parent.</li> </ul>
Action	Police and or social care LA threshold 4	Social Care LA threshold 3	Preventative services. Early Help LA threshold 1 & 2

## **APPENDIX 3**

### **Useful Contacts**

Luton Borough Council- 01582 548069 [paul.james@luton.gov.uk](mailto:paul.james@luton.gov.uk)  
Central Bedfordshire Council- 0300 300 4833  
Bedford Borough Council- 01234 276693 [LADO@bedford.gcsx.gov.uk](mailto:LADO@bedford.gcsx.gov.uk)  
Cambridgeshire County Council. 0345 045 5203 (Monday to Friday, 8am - 6pm.)  
Milton Keynes Council- 01908 254300

#### **Bedford Borough-**

LADO Bedford Borough Council- 01234 276693 [LADO@bedford.gcsx.gov.uk](mailto:LADO@bedford.gcsx.gov.uk)

**Initial Referrals to Multi Agency Support Hub (MASH) on 01234 718700** (9.00-5.20 Mon to Thu, 9.00-4.20 Fri) **or e mail** [multiagency@bedford.gov.uk](mailto:multiagency@bedford.gov.uk)

**EDT out of hours service 0300 300 8123**

**Virtual Schools Head** – Alison Pullen 01234 276712

#### **Cambridgeshire County Council-**

LADO Cambridgeshire County Council. 0345 045 5203 (Mon to Fri 8:00 – 6:00)

**Initial referrals to** 0345 045 5203 between 8:00 and 6:00 Mon to Fri.

Email: [Referral.Centre2@cambridgeshire.gov.uk](mailto:Referral.Centre2@cambridgeshire.gov.uk)

EDT out of hours service on 01733 234 724

**Virtual Schools Head** 01223 699 883

#### **Central Bedfordshire-**

LADO Central Bedfordshire Council 0300 300 4833

**Initial referrals** Access and Referral Hub on 0300 300 8585

[cs.accessandreferral@centralbedfordshire.gov.uk](mailto:cs.accessandreferral@centralbedfordshire.gov.uk)

EDT out of hours service 0300 300 8123

**Virtual Schools** Email: [Jackie.edwards@centralbedfordshire.gov.uk](mailto:Jackie.edwards@centralbedfordshire.gov.uk)

#### **Hertfordshire County Council-**

LADO 0300 1234 043

Children's Services (including out of hours): **0300 123 4043**

**Virtual School Head** Felicity Evans

#### **Luton Borough Council-**

LADO Paul James 01582 548069 [paul.james@luton.gov.uk](mailto:paul.james@luton.gov.uk)

Initial referrals MASH 01582 547653.

EDT out of hours service 0300 300 8123

#### **Milton Keynes-**

LADO Bill Brook 01908 254300

Initial referrals 9am - 5.15pm Monday to Friday 01908 691691

EDT out of hours service 01908 265545

**NSPCC Whistle-Blowing hotline** 0800 028 0285

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Police 999 or 101

## **Supporting documentation**

Addendum 1 – COVID 19 Safeguarding Policy Updates

KWS Safeguarding referral flow chart

KWS Anti Bullying Policy

KWS Attendance Policy

KWS Behaviour Policy

KWS LAC/PLAC Policy

KWS Code of Conduct for all staff and volunteers

KWS Safer Recruitment Policy

KWS Visitors Policy

KWS Whistle blowing policy

KWS Complaints policy

KWS Data Protection Policy

KWS Health and Safety Policy

KWS RAG risk indicators document, also found in this policy

Individual LA procedure and threshold documents.

The Children Act 1989

The Children Act 2004

Working Together to Safeguard Children (HM Government 2018)

DfES guidance” Preventing and Tackling Bullying March 2014.

The Education (Student Information) (England) Regulations 2005

Dealing with Allegations of Abuse against Teachers and Other Staff (DfE 2011)

Keeping Children Safe in Education (2019)

Education Act 2002 (section 175/157)

Mandatory reporting on FGM procedural information (Home Office 2015)

Use of reasonable force in schools (DfE, 2013)

Mental Health and Behaviour in Schools: Departmental Advice (DfE, 2016)

Serious Crime Act 2015

Sexting in Schools and Colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety, 2016)

The PREVENT Duty The department advice for school and childcare providers (DfE 2015)

Barnardos domestic violence risk identification matrix.

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are students at the school.

“Working Together to Safeguard Children” (2015) requires all schools to follow the procedures for protecting children from abuse which are defined by the Safeguarding Children Board and have appropriate procedures in place for responding to all concerns of actual or suspected abuse including allegations against members of staff in a position of trust.

Prevent Duty under section 26 of the Counter-Terrorism and Security Act 2015,

Home Office Consultation on statutory multi-agency guidance on Female Genital Mutilation

Also taking into consideration the Governments new stance on Honour Based Violence and Forced Marriage that is not exclusive to female students.

PAN-BEDFORDSHIRE CHILD SEXUAL EXPLOITATION GROUP (CSEG) GUIDANCE FOR PRACTITIONERS A Step-by-Step Guide to Responding to Child Sexual Exploitation Concerns<sup>1</sup>

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<sup>1</sup> This process replaced the previous ‘Child Sexual Exploitation Panel (CSEP) Operating Protocol  
KWS Safeguarding & Child Protection Policy Version 6 – June 2020