

# Blanford Mere Nursery & Primary School



## Safeguarding & Child Protection Policy

<b>Date adopted by governors</b>
November 2023
<b>To be reviewed</b>
November 2024

## Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Kerry Crook	<a href="mailto:KCrook@blanford.dudley.sch.uk">KCrook@blanford.dudley.sch.uk</a>
Deputy DSL	Angela Stanton	<a href="mailto:ASTanton@blanford.dudley.sch.uk">ASTanton@blanford.dudley.sch.uk</a>
Local authority designated officer (LADO)	Yvonne Nelson-Brown	<a href="mailto:Yvonne.Nelson-Brown@dudley.gov.uk">Yvonne.Nelson-Brown@dudley.gov.uk</a> <a href="mailto:Allegations@dudley.gov.uk">Allegations@dudley.gov.uk</a>
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# 1. Purpose and Aims

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

## The school aims to ensure that:

- ✓ Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- ✓ All staff are aware of their statutory responsibilities with respect to safeguarding
- ✓ Staff are properly trained in recognising and reporting safeguarding issues
- ✓ Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

## We give special consideration to children who:

- ✓ Have special educational needs (SEN) or disabilities
- ✓ Are young carers
- ✓ May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- ✓ Have English as an additional language
- ✓ Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- ✓ Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
- ✓ Are asylum seekers
- ✓ Are at risk due to either their own or a family member's mental health needs
- ✓ Are Children in Care or previously Children in Care
- ✓ Are missing or absent from education for prolonged periods and/or repeat occasions
- ✓ Whose parent/carer has expressed an intention to remove them from school to be home educated

# 2. Statutory Framework

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#) in addition [DfE's filtering and monitoring standards](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

[The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment.

[The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

[Information](#) [Sharing](#) (2018)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the 2018 Childcare Disqualification Regulations) and [Childcare Act 2006](#), which set out who is disqualified from working with children

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

Local multi-agency safeguarding arrangements.

The school’s policy has been written taken into consideration our locally agreed multi-agency procedures that have been put in place by the three safeguarding partners:

- ✓ (The local authority (LA))
- ✓ Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- ✓ The chief officer of police for a police area in the LA area

. The links for Dudley’s procedures are below:

<https://dudleysafeguarding.org.uk/>

<https://dudleysafeguarding.org.uk/wp-content/uploads/2023/03/DSPP-Support-Level-Guidance-and-Framework-March-2023.pdf>

The safeguarding priorities for Dudley 2022/24 are:

Neglect

Exploitation

Family Safeguarding

These are detailed further on the above website and are included in whole school training.

### **3. The Designated Safeguarding Lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Kerry Crook. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL is contactable outside of school hours by email: [kcrook@blanford.dudley.sch.uk](mailto:kcrook@blanford.dudley.sch.uk).

When the DSL is absent, the deputy DSL, Angela Stanton– will act as cover.

If the DSL and deputy are not available, the Chair of governors and safeguarding lead, Allan Weaver will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- ✓ Work closely with teachers and share information & provide advice and support to other staff on child welfare and safeguarding and child protection matters
- ✓ Sets out procedures so that staff promptly share their safeguarding concerns in writing
- ✓ 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 and college leadership staff. Their role could include ensuring that the school or college, 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.
- ✓ Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- ✓ Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.
- ✓ Refer cases where a crime may have been committed to the Police
- ✓ Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- ✓ Contribute to the assessment of children, particularly in relation to Early Help
- ✓ Work closely with Mental Health Leads
- ✓ Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Panel, Disclosure and Barring Service and/or police), and support staff who make such referrals directly
- ✓ Have a good understanding of harmful sexual behaviour

- ✓ Have a good understanding and takes the lead of the filtering and monitoring systems and processes in place at our school, this is included in the DSL's job description
- ✓ Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- ✓ Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- ✓ The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

The full responsibilities of the DSL and deputy are set out in their job description.

#### **4. The Headteacher, Governing Body, Trustees, Proprietors**

**The Headteacher is responsible for the implementation of this policy, including:**

- ✓ Ensuring that staff (including temporary & supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- ✓ Communicating this policy to parents when their child joins the school and via the school website
- ✓ Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ✓ Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- ✓ Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- ✓ Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required
- ✓ Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- ✓ Complete appropriate safeguarding and child protection (including online) training
- ✓ Ensuring the relevant staffing ratios are met, where applicable
- ✓ Making sure each child in the Early Years Foundation Stage is assigned a key person
- ✓ Overseeing the safe use of technology, mobile phones and cameras in the setting
- ✓ Promoting good oral health and signposting accordingly to services

**The Governing body, Trustees or Proprietors will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.**

The Governing Body will appoint a senior board level (or equivalent) lead Safeguarding Governor – Allan Weaver to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Chair of governors, Allan Weaver will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).

Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

- ✓ Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- ✓ Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- ✓ Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- ✓ Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- ✓ Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

All Governors have read and understood Keeping Children Safe in Education 2023. (Part Two of this policy has information on how governors are supported to fulfil their role.)

## 5. Safeguarding Policies and Procedures/Legal Responsibilities and duty to share information

### Our safeguarding responsibilities include:

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

Child protection refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Children includes everyone under the age of 18.

Three Safeguarding Partners as identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- ✓ The local authority (LA)
- ✓ A clinical commissioning group for an area within the LA
- ✓ The chief officer of police for a police area in the LA area

### Our Roles and Responsibilities include:

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education by embedding safeguarding and well being in the school curriculum. Our school curriculum is detailed in Section 21 of this Policy

## All staff

- ✓ Will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- ✓ Sign a declaration at the beginning of each academic year to say that they have reviewed, understand, and will follow the guidance

Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)

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

All staff will be aware of:

- ✓ Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct and the role and identity of the designated safeguarding lead (DSL) and deputy.
- ✓ The behaviour policy.
- ✓ Online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education.
- ✓ The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- ✓ The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- ✓ What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- ✓ The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child exploitation (CSE/CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- ✓ The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- ✓ The fact that children can be at risk of harm inside and outside of their home, at school and online.
- ✓ What to look for to identify children who need help or protection.

## Staff safeguarding training.

- ✓ All staff members will undertake safeguarding and child protection training, online safety training including IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with local and statutory guidelines.
- ✓ All staff will undertake annually training on Cyber-security training.
- ✓ Have regard to the Teachers' Standards to support the expectation that all teachers:
- ✓ Manage behaviour effectively to ensure a good and safe environment
- ✓ Have a clear understanding of the needs of all pupils/students.



- ✓ All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- ✓ Staff will also receive regular safeguarding and child protection updates including online safety, as required but at least annually. Regular updates throughout the academic year could include (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- ✓ All new staff will receive robust safeguarding training in line with the whole school training package, this will be delivered as part of their induction process before they commence working with our pupils/students.

## **Volunteers and Contractors**

All volunteers and contractors will receive appropriate training, as applicable.

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

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

Visitors are expected to sign in on our school system and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

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

## **The DSL and deputy DSL**

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years. Online safety training will be undertaken annually and regularly updated to keep knowledge of staying safe online and the risks associated up to date, this includes including filtering and monitoring and cyber security

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

## **Governors**

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- ✓ Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- ✓ Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' if an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

All Governors will undertake training relating to online filtering and monitoring, in addition one Governor will be trained in Cyber-security.

## 6. Confidentiality

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 10

## 7. Communication with parents

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

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

If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will usually notify the parents of all the children involved.

We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

## 8. Whole Staff Responsibilities

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

### **If a child is suffering or likely to suffer harm, or in immediate danger**

Make a referral to Multi Agency Support Team relevant to the child's home address, for Dudley children this is Dudley Front Door and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL/DDSL as soon as possible if you make a referral directly.

Dudley **Report it** page: <https://dudleysafeguarding.org.uk/>

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

- ✓ Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- ✓ Stay calm and do not show that you are shocked or upset
- ✓ Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- ✓ Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- ✓ Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- ✓ Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so

Aside from the above professionals, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

It is important to also understand the following:

- ✓ The child may not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- ✓ Not recognise their experiences as harmful
- ✓ Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

## 9. Record keeping

- ✓ We will hold records in line with our records retention schedule.
- ✓ All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.
- ✓ Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- ✓ Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.
- ✓ If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely, within 5 school days of starting at the new education setting, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information (using the pupil safeguarding form) to enable them to have time to make any necessary preparations to ensure the safety of the child.
- ✓ Safeguarding records are paper-based and kept in a secure location.
- ✓ The school shares information with other agencies in line with Dudley safeguarding procedures.

**If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Figure 1 (page 14) illustrates the procedure to follow if you have any concerns about a child's welfare.**

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by completing a Request for Advice and Support [Children's Services Portal site](#) or contact 0300 555 0050.

To refer into Dudley Exploitation hub (DEX): [CS.Hub@dudley.gov.uk](mailto:CS.Hub@dudley.gov.uk) also complete a Request for Support and Advice Form to be submitted via the portal.

Make a referral to Local Authority Children's Social Care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

### **Referral**

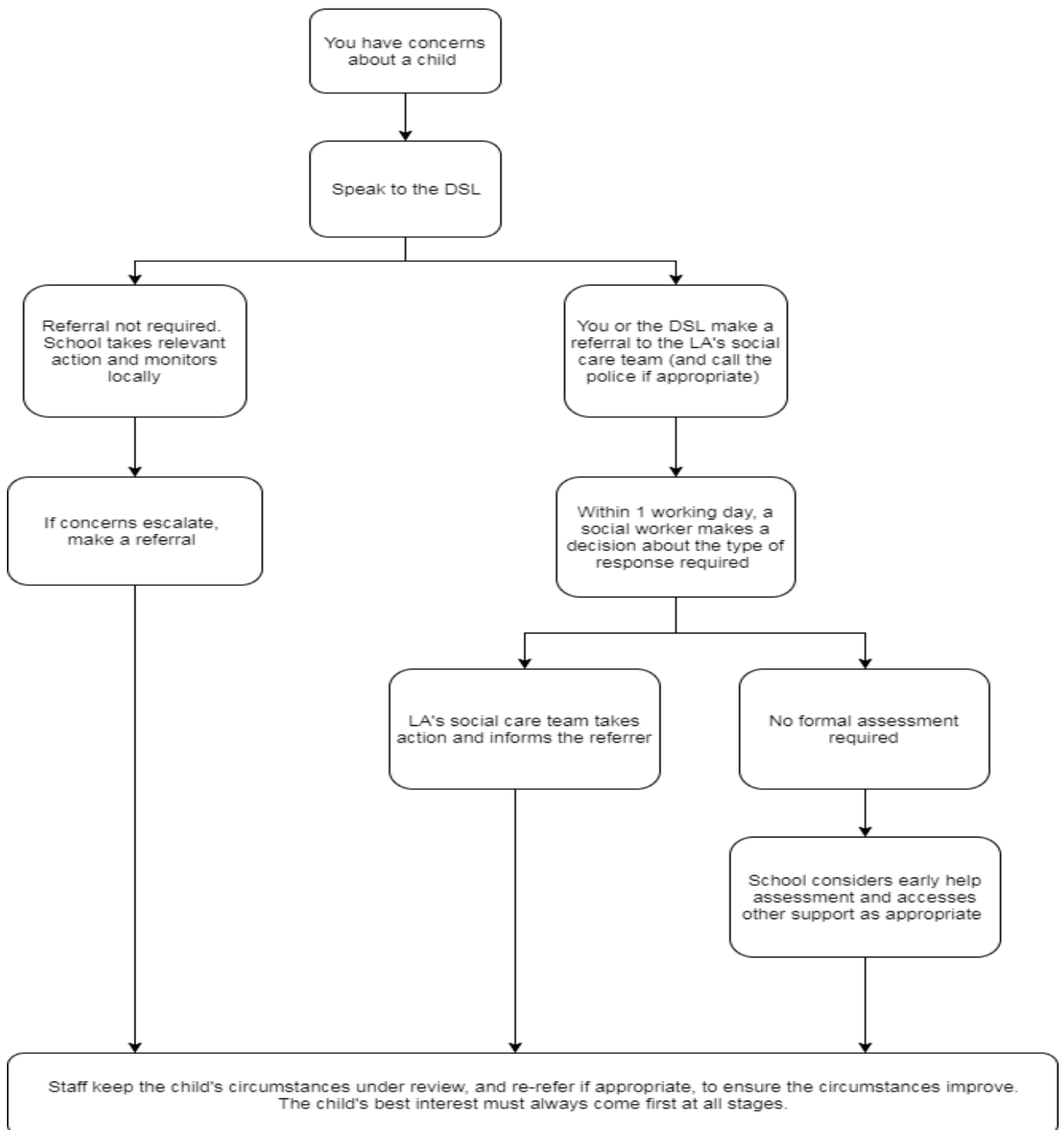
If it is appropriate to refer the case to Local Authority Children's Social Care or the Police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Advice and further information on Dudley Professional Resolution can be accessed from the Lead for Safeguarding in Education or directly of the Dudley Safeguarding partnership website.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action.)



## 10. Thresholds and Early Help

If early help is appropriate, the DSL/DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

Level 1 - No referral is required. Professionals should contact Dudley's Family Information Service on 01384 814398 to obtain universal information about support available for children, young people and families.

Dudley Safeguarding Partnership threshold guidance is below, this should be considered when completing Request for Help and Support Form

<https://dudleysafeguarding.org.uk/wp-content/uploads/2023/03/DSPP-Support-Level-Guidance-and-Framework-March-2023.pdf>

## 11. When to be concerned

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) **sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse)**, criminal exploitation, serious youth violence, county lines, and radicalisation.

Abuse: 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.** 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 by another child or children.

### Signs and Symptoms of Abuse

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

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Emotional abuse may involve:**

- ✓ Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- ✓ Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- ✓ Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- ✓ Seeing or hearing the ill-treatment of another
- ✓ Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening.

### **The activities may involve:**

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

### **Once a child is born, neglect may involve a parent or carer failing to:**

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

## **12. Specific Safeguarding Issues**

This section is based on the advice in Annex B of Keeping Children Safe in Education.

Annex B also includes information on further issues to be aware of, including children's involvement in the court system, children with family members in prison, and county lines.

### **Child on child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child on child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

Child on child abuse can include the following:

- ✓ Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- ✓ Abuse in intimate personal relationships between children (this is sometimes known as ‘teenage relationship abuse’)
- ✓ Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- ✓ 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 and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- ✓ Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- ✓ Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- ✓ Up skirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- ✓ Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn’t mean that this kind of abuse isn’t happening.

Most cases of pupils/students hurting other pupils/students will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- ✓ Is serious, and potentially a criminal offence
- ✓ Could put pupils/students in the school at risk
- ✓ Is violent
- ✓ Involves pupils being forced to use drugs or alcohol
- ✓ Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including sexting)

**If a pupil makes an allegation of abuse against another pupil:**

- ✓ You must record the allegation and tell the DSL, but do not investigate it
- ✓ The DSL will contact the Local Authority Children’s Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence



- ✓ The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- ✓ The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate

### **We will minimise the risk of Child-on-Child abuse by:**

- ✓ Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- ✓ Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ✓ Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- ✓ Ensuring pupils know they can talk to staff confidentially by creating a caring and trusting ethos as well as having a trusted adult within their class/year group.
- ✓ Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

## **Consensual and Non-consensual sharing of indecent images**

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for [all staff](#) 2017 and for [DSLs and senior leaders](#).

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- ✓ View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- ✓ Delete the imagery or ask the pupil to delete it
- ✓ Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- ✓ Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- ✓ Say or do anything to blame or shame any young people involved

### **Initial review meeting**

- ✓ Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:
- ✓ Whether there is an immediate risk to pupil(s)
- ✓ If a referral needs to be made to the police and/or children’s social care
- ✓ If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- ✓ What further information is required to decide on the best response
- ✓ Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)

- ✓ Whether immediate action should be taken to delete or remove images from devices or online services
- ✓ Any relevant facts about the pupils involved which would influence risk assessment
- ✓ If there is a need to contact another school, college, setting or individual
- ✓ Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)
- ✓ The DSL will make an immediate referral to police and/or children's social care if:
  - ✓ 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)
  - ✓ What the DSL knows about 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 pupil in the imagery is under 13
  - ✓ The DSL has reason to believe a pupil 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 apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialing 101.

### **Recording incidents**

All Sharing of nudes/semi-nude incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 10 of this policy also apply to recording incidents.

This policy is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **Female Genital Mutilation - If you discover that FGM has taken place or a pupil is at risk of FGM**

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

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

## **Honour Based Abuse (including Forced Marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## **Forced Marriage**

[Implementation of the Marriage and Civil Partnership \(Minimum Age\) Act 2022](#). Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

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

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

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

The DSL will:

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

## Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be trafficked, forced to work in cannabis factories, modern slavery, coerced into moving drugs or money across the country (county lines), involved in gangs and knife crime, forced to shoplift or pickpocket, or to threaten other young people.

### **Indicators of CCE can include a child:**

- ✓ Appearing with unexplained gifts or new possessions
- ✓ Associating with other young people involved in exploitation
- ✓ Involved in gangs and knife crime
- ✓ Suffering from changes in emotional wellbeing
- ✓ Misusing drugs and alcohol
- ✓ Going missing for periods of time or regularly coming home late
- ✓ Regularly missing school or education
- ✓ Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

### **In addition to the CCE indicators above, indicators of CSE can include a child:**

- ✓ Having an older boyfriend or girlfriend
- ✓ Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Children who are absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

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

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

For further information: Children Missing Education statutory guidance for local authorities 2016 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children Missing Education - statutory guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

## **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Please refer to our ATTENDANCE POLICY 2023.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. West Midlands police forces are part of [Operation Encompass](#)

The DSL will provide support according to the child's needs and update records about their circumstances.

## Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable, see Part Five of KCSiE 2023.

### Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

Ultimately, the school will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- ✓ Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- ✓ Regularly review decisions and actions, and update policies with lessons learnt
- ✓ Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- ✓ Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- ✓ Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- ✓ Challenging inappropriate behaviours
- ✓ Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- ✓ Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures within school ensuring that the DSL is informed immediately.

## Radicalisation and Extremism

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

**Terrorism** is an action that:

- ✓ Endangers or causes serious violence to a person/people;
- ✓ Causes serious damage to property; or
- ✓ Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL and DDSL's will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children susceptible.

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

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



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

Dudley's LA Prevent Officer is [Mark.Wilson@dudley.gov.uk](mailto:Mark.Wilson@dudley.gov.uk)

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our reporting procedures including discussing their concerns with the DSL.

Staff should **always** act if they are worried.

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

### **If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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



The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

## **Mental Health - If you have a mental health concern**

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.

The school's Mental Health Lead is Kerry Crook

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

## **Areas with particular risk (not exhaustive)**

You may wish to include any of the following :

- **Physical intervention**
- **Personal/Intimate care**
- **Changing for PE and swimming**
- **1:1 working**
- **Overnight stays**
- **Boarding schools**
- **Host families**
- **Private Fostering**
- **School dogs/therapy dogs**
- **Pupils being taught off site**
- **Elective Home Education (EHE)**
- **Children persistently absent or have episodes of missing**
- **Young carers**
- **Children of parents with mental health issues**
- **Children and the court system**
- **Children with family members in prison**

## **13. LGBT+ pupils**

Some pupils/students may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, bi-phobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness.

Several studies also evidence that LGBT+ young people may be at increased risk of becoming victims of CSE.

Schools should therefore ensure that they are aware of the increased risk factors and know how to access appropriate support for these young people when required.

## 14. Online Safety and the use of mobile technology

KCSIE outlines that your policies on online safety and the use of mobile and smart technology should be reflected in your child protection and safeguarding policy. Among other things, this should include filtering and monitoring on school devices and the school network.

- ✓ mobile and smart technology e.g. mobile phones, smart watches
- ✓ guidelines for the use of mobile phones for the whole school community
- ✓ mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- ✓ **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- ✓ **Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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

### As a school we:

- ✓ Educate pupils about online safety as part of our curriculum. For example:
- ✓ The safe use of social media, the internet and technology
- ✓ Keeping personal information private
- ✓ How to recognise unacceptable behaviour online
- ✓ How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- ✓ Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- ✓ Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- ✓ Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- ✓ Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- ✓ Staff will not take pictures or recordings of pupils on their personal phones or cameras
- ✓ Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- ✓ Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- ✓ Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- ✓ Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Include the latest Screening and confiscation guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1091132/Searching\\_Screening\\_and\\_Confiscation\\_guidance\\_July\\_2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching_Screening_and_Confiscation_guidance_July_2022.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/811796/Teaching\\_online\\_safety\\_in\\_school.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf)

## 15. Children in Care (CiC) and Post Children in Care

Designated person should aim to work in partnership with the Virtual School Coordinator on how funding can best support the progress of a CiC. The name of the Virtual Headteacher is Emma Thomas [Emma.Thomas@dudley.gov.uk](mailto:Emma.Thomas@dudley.gov.uk)

We will ensure that staff have the skills, knowledge and understanding to keep Children in Care and previous Children in Care safe. We will ensure that:

- ✓ Appropriate staff have relevant information about Children in Care's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- ✓ The DSL has details of children's social workers and relevant virtual school heads
- ✓ We have appointed a designated teacher, Kerry Crook who is responsible for promoting the educational achievement of Children in Care and previous Children in Care in line with [statutory guidance](#).
- ✓ The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

**As part of their role, the designated teacher will:**

- ✓ Work closely with the DSL to ensure that any safeguarding concerns regarding Children in Care and previous Children in Care are quickly and effectively responded to
- ✓ Work with virtual school heads to promote the educational achievement of, Children in Care and previous Children in Care, including discussing how pupil premium plus funding can be best used to support CiC and meet the needs identified in their personal education plans

## 16. Pupils/students with a social worker

Pupils/students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- ✓ Responding to unauthorised absence or missing education where there are known safeguarding risks
- ✓ The provision of pastoral and/or academic support

## **17. Children with Special Educational Needs and Disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- ✓ Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- ✓ Pupils being more prone to peer group isolation than other pupils
- ✓ The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- ✓ Communication barriers and difficulties in overcoming these barriers
- ✓ We offer extra pastoral support for pupils with SEN and disabilities. This includes:
- ✓ Our Senco is Mrs Jennifer Cartwright

## **18. Safer Recruitment procedure**

### **Recruitment and selection process**

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2023.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### **Advertising**

When advertising roles, we will make clear:

- ✓ Our school's commitment to safeguarding and promoting the welfare of children
- ✓ That safeguarding checks will be undertaken
- ✓ The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- ✓ Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

#### **Application forms**

Our application forms will:

- ✓ Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- ✓ Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- ✓ Consider any inconsistencies and look for gaps in employment and reasons given for them
- ✓ Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- ✓ Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - ✓ If they have a criminal history
  - ✓ Whether they are included on the barred list
  - ✓ Whether they are prohibited from teaching
  - ✓ Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - ✓ Any relevant overseas information
  - ✓ Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

## **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- ✓ Not accept open references
- ✓ Liaise directly with referees and verify any information contained within references with the referees
- ✓ Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- ✓ Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- ✓ Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- ✓ Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- ✓ Resolve any concerns before any appointment is confirmed

## **Interview and selection**

When interviewing candidates, we will:

- ✓ Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- ✓ Explore any potential areas of concern to determine the candidate's suitability to work with children
- ✓ Record all information considered and decisions made

### **Pre-appointment vetting checks**

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

### **New staff**

- ✓ All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:
  - ✓ Verify their identity
  - ✓ Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
  - ✓ Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
  - ✓ Verify their mental and physical fitness to carry out their work responsibilities
  - ✓ Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
  - ✓ Verify their professional qualifications, as appropriate
  - ✓ Ensure they are not subject to a prohibition order if they are employed to be a teacher
  - ✓ Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - ✓ For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
    - ✓ For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- ✓ Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- ✓ Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- ✓ Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- ✓ There are concerns about an existing member of staff's suitability to work with children; or
- ✓ An individual moves from a post that is not regulated activity to one that is; or
- ✓ There has been a break in service of 12 weeks or more
- ✓ We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- ✓ We believe the individual has engaged in [relevant conduct](#); or
- ✓ We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- ✓ We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- ✓ The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- ✓ An enhanced DBS check with barred list information for contractors engaging in regulated activity
- ✓ An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- ✓ We will obtain the DBS check for self-employed contractors.
- ✓ We will not keep copies of such checks for longer than 6 months.
- ✓ Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- ✓ We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

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



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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- ✓ Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- ✓ Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- ✓ Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

- ✓ All governors [in academies: All trustees, local governors and members] will have an enhanced DBS check without barred list information.
- ✓ They will have an enhanced DBS check with barred list information if working in regulated activity.
- ✓ All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

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

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

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

### **Pupils staying with host families**

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

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



## **19. Procedure for dealing with Allegations about Staff - Concerns about a staff member, supply teacher or volunteer**

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

Procedure for dealing with complaints and allegations about staff – See Part Four of KCSiE and detail your individual setting response, this could be what you have in your staff behaviour policy/code of conduct, ensure that they are consistent. Some settings have a separate policy on this matter.

Managing Allegations criteria added for the LADO so schools must work with other agencies to investigate when a member of staff has **“behaved or may have behaved in a way that indicates they may not be suitable to work with children”**

Further guidance on how schools and colleges should handle allegations against supply staff & volunteers, has been added and handled accordingly.

Policy should be clear that any concerns about the conduct of other adults in the school should be taken to the Headteacher (NOT to DSL, unless DSL is also the Headteacher)

### **Procedure for dealing with complaints and allegations about the headteacher or proprietor**

Concerns about the Headteacher should go to the Chair of Governors. (In proprietor-led independent schools, concerns about the proprietor(s) directly to the local authority Designated Officer (LADO).

**LADO is Yvonne Nelson-Brown [Yvonne.nelson-brown@dudley.gov.uk](mailto:Yvonne.nelson-brown@dudley.gov.uk)**

The policy should be clear about the steps the DSL should take in order to refer a concern outside the school, e.g. a social services enquiry or to LADO.

**The headteacher/chair of governors will then follow the procedures:**

### **Staff concerns that do not meet the harm threshold.**

We are aware that concerns may arise in several ways and from several sources, for example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of our setting; or as a result of vetting checks undertaken.

We have the appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children. As part of our whole school approach to safeguarding, we promote an open and transparent culture in which **all** concerns about **all** adults working in or on behalf of our setting (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We have created a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, and this is critical. We encourage an open and transparent culture; enabling us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Blanford Mere Primary School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. Low level concern is still a concern, no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- and does not meet the allegations threshold or is otherwise not considered serious enough to consider 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,
- using inappropriate sexualised, intimidating, or offensive language.

We understand how crucial it is that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Head teacher or Chair of Governors should contact the LADO directly

## 20. Whistleblowing

If you have a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures – refer to it here.

Alternatively, explain your procedures for raising concerns about the school's safeguarding practice here. You should consider:

- ✓ What areas of malpractice or wrongdoing are covered by the procedures?
- ✓ The options available for reporting a concern, including who to approach within the school and externally
- ✓ How the school will respond to such concerns
- ✓ What protection is available to staff who report another member of staff

Early years providers should also note the requirements set out in paragraph 3.75 of the statutory framework for the Early Years Foundation Stage; you may wish to cover these here if not already covered in a separate policy.

## 21. Policies and procedures

Please make reference to the following policies and procedures:

- ✓ **Behaviour**
- ✓ **Staff code of conduct**
- ✓ **Complaints**
- ✓ **Health and safety**
- ✓ **Attendance**

- ✓ **Online safety**
- ✓ **Equality**
- ✓ **Sex and relationship education**
- ✓ **First aid**
- ✓ **Designated teacher for looked-after and previously looked-after children**
- ✓ **Privacy notices**
- ✓ **GDPR**
- ✓ **Whistleblowing**
- ✓ **Safer Recruitment**
- ✓ **Anti-bullying**
- ✓ **IT / Acceptable Use policy**

## **23. Complaints Procedure**

See complaints policy 2023