

# Child Protection & Safeguarding

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#### 1 - Introduction

1.1 Leicester City Primary PRU fully recognises the contribution it can make to protect children and support pupils in school. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child-centered. This means that they should consider, at all times, what is in the **best interests of the child** (KCSIE19). The aim of this policy is to safeguard and promote our pupils' welfare, safety and health by fostering an honest, open, caring and supportive climate and for our staff members working with pupils to maintain an attitude of 'it **could happen here'** where safeguarding is concerned. This policy sets out how the school and the Management Committee discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the school.

#### Safeguarding is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best life chances.
- 1.2 No single professional can have a full picture of all a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Leicester City Primary PRU is committed to safeguarding and promoting the welfare of all its students. We believe that:
  - All children/young people have the right to be protected from harm;
  - Children/young people need to be safe and to feel safe in school, meaning our staff consider, at all times, what is in the best interest of the children/young people;
  - Children/young people need support which matches their individual needs, including those who may have experienced abuse;
  - All children/young people have the right to speak freely and voice their values and beliefs:
  - All children/young people must be encouraged to respect each other's values and support each other;



- All children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy healthy sociable child/young person will achieve better educationally;
- The staff within our school are prepared to identify children and young people who may benefit from Early Help intervention;
- Schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours; and
- All staff and visitors have an important role to play in safeguarding children and protecting them from abuse.
- 1.3 Leicester City Primary PRU will fulfil local and national responsibilities and accepted best practice as laid out in the following documents:
  - Working Together to Safeguard Children (DfE March 2018)
  - Keeping Children Safe in Education: Statutory guidance for schools and colleges (DfE Sept 2019)
  - The School Staffing (England) Regulations 2009 & Amended Regulations 2015;
  - Safer Recruitment in Education including Guidance for Safer Working Practice Rev 2019 (Safer Recruitment Consortium)
  - Prevent Duty 2015
  - **Information sharing:** Advice for Practitioners providing safeguarding services to children, young people, parents and carers. (March 2015)
  - 'What To Do If You Are Worried A Child Is Being Abused' (March 2015)
  - Leicester Safeguarding Children's Board Procedures (LSCB) http://llrscb.proceduresonline.com/chapters/contents.html
  - The Children Act 1989 and 2004
  - The Education Act 2002 s175/s157
  - Mental Health and Behaviour in Schools: Departmental Advice (DfE 2014)
  - Framework for the Assessment of Children in Need and their Families 2000
  - Sexual Offences Act 2003 (Position of Trust offence)
  - Sexual Violence and Sexual Harassment between children in schools and colleges (May 2018)
  - Voyeurism (Offences Act) 2019
  - Childcare (Disqualification) regulations 2009
  - Counter Terrorism and Security Act 2015
  - Female Genital Mutilation Act 2003
  - Child Protection & Safeguarding in Education procedures in Leicester, notes, information, and training for Designated Safeguarding Leads (DSL) in schools
  - Children and Families Act 2014
  - Safeguarding and Vulnerable Group Act 2006



- 1.4 The Management Committee takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.
- 1.5 We recognise that all staff and governors have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.
- 1.6 All staff[1] believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

#### 2 - Overall Aims

- This policy will contribute to safeguarding our students and promoting their welfare by supporting the child's development in ways that will foster security, confidence and resilience at the same time considering the best interest of the child.
- Providing an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- Raising the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- Providing a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support plans for those children including Child Missing from Education.
- Acknowledging the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils.
- Developing a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- Developing effective working relationships with all other agencies involved in safeguarding children. Including appropriate work within the curriculum.
- Work within the curriculum raising awareness of and promoting safeguarding, on and off line, to our children/young people.
- Ensuring that all adults within our school who have access to children have been checked as to their suitability. This includes other community users of our facilities.



#### 3 - Key processes

Our school procedures for safeguarding children are in line with the *Leicester City Safeguarding Children's Board (LSCB), Multi Agency Child Protection/Safeguarding Procedures;* <a href="http://lrscb.proceduresonline.com/chapters/contents.html">http://lrscb.proceduresonline.com/chapters/contents.html</a>), in addition to the statutory requirements as outlined in 1.3.

#### 4 - Expectations

#### 4.1 All staff and visitors will be familiar with this policy

- Staff will have access to, a copy of, and be well versed in our Child Protection
   & Safeguarding Policy; which will also form part of their induction and revisited annually s through Whole School Safeguarding Training.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc;
- For those regular external visitors/providers such as cleaners and caterers; to have shown the school a copy of their H & S and Child Protection Guidelines as best practice and where applicable; and that the school has a statement in main reception notifying external visitors who the school's DSL is and what to do if they have any concerns about a child's welfare.
- Be involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans;
- Be alert to signs and indicators of possible abuse (See **Appendix 1**).
- · Record concerns/disclosures and give the record to the DSL; and
- Deal with a disclosure of abuse from a child in line with our school procedures; informing the DSL immediately, and provide a written account as soon as possible. This includes making the appropriate contact with children's social care (DSL).
- Record safeguarding information using school procedures in paper form (on pink sheets) and electronically (on CPOMS).

#### 4.2 All parents will be familiar with this policy

Parents/Carers will have access to the Child Protection & Safeguarding Policy as part of initial information given to perspective/existing Parents/Carers and will be available through our school's website. Additional copies will be issued as and when required including notifying parents of changes within the document.



#### 4.3 Communicating with parents

In addition to section 4.2 above, the following statement is provided and highlighted to parents so they are aware of the school's responsibilities:

'Leicester City Primary PRU ensures children learn in a safe, caring and enriching environment. Children are taught how to keep themselves safe, on and off line, to develop positive and healthy relationships and how to avoid situations where they might be at risk including by being exploited.

The school has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. Schools are not able to investigate concerns but have a legal duty to refer them. In most instances, the school will be able to inform the parents/carer of its need to make a referral. However, sometimes the school is advised by Children's Social Care or police that the parent/carer cannot be informed whilst they investigate the matter. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The school follows legislation that aims to act in the interests of the child.'

#### 5 - Extended school and before and after school activities

- 5.1 Where the Management Committee provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply.
- 5.2 Where services or activities are provided separately by another body, the Management Committee should seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the school on these matters where appropriate.

#### 6 - Procedures

- 6.1 Leicester City Primary PRU will ensure that:
  - The Management Committee understands and fulfils its safeguarding responsibilities.
  - We have a Designated Safeguarding Lead and a Deputy Designated Safeguarding Lead for child protection and safeguarding, who have



undertaken DSL training delivered by Safeguarding in Education, Leicester City Council; of which their training will be refreshed every two years. All senior teachers are also trained DSLs.

- All members of staff are provided with opportunities annually to receive Safeguarding training by the Safeguarding in Education team in order to develop their understanding of child protection and safeguarding in particular the signs and indicators of abuse.
- All members of staff, volunteers, and governors know how to respond to a pupil who discloses abuse, and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- All parents/carers are made aware of the school's responsibilities in regard to child protection procedures through publication of the school's Child Protection and Safeguarding Policy, and reference to it in our prospectus/brochure and home school agreement.
- Community users organising activities for children are aware of and understand the need for compliance with the school's child protection guidelines and procedures.
- Leicester City Primary PRU is committed to safer recruitment as outlined in Keeping Children Safe in Education 2019. The school will ensure all appropriate checks are carried out for all staff and volunteers. Appropriate checks will be recorded on the Single Central Record which will be audited termly by Pauline Spence. The school will ensure that at least one person who is safer recruitment trained will be part of the recruitment process. All volunteers will undergo a risk assessment. See also the Safer Recruitment policy.
- The name of any member of staff considered not suitable to work with children will be notified to either the Disclosure and Barring Service or the relevant Government Department/Agency (where appropriate), depending on the nature of the concern, with the advice and support of the Local Authority Designated Officer. (LADO).
- All governors will undergo a DBS check and a S128 check as outlined in paragraph 1783 of Keeping Children Safe in Education 2019.
- The name of any member of staff considered not suitable to work with children will be notified to either the Disclosure and Barring Service or the relevant Government Department/Agency (where appropriate), depending on the nature of the concern, with the advice and support of the Local Authority Designated Officer (LADO), and that a member of our SLT has attended LADO training (Managing allegations against staff members).
- Our procedures will be annually reviewed and up-dated, and ratified by the Management Committee.
- The name of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will be clearly shown in the school, with a statement



- explaining the school's role in referring and monitoring cases of suspected abuse.
- All adults, (including supply teachers, non-teaching staff and volunteers), new to our school will be given or directed to a copy of the Child Protection and Safeguarding Policy, Staff Code of Conduct, the booklet 'What To Do if You're Worried A Child is Being Abused'[2], Keeping Children Safe in Education Part 1 and Annex B[3], and the name and contact details of the Designated Safeguarding Lead will be explained as part of their induction into the school. In addition to this, all such staff and volunteers will be made aware of the 'Guidance for Safer Working Practice DfE 2009 for Adults who work with Children and Young People' booklet and the document 'Guidance for safer working practice for those working with children and young people in education settings, 2019 (Safer Recruitment Consortium).[4]

#### 7 - Responsibilities

- 7.1 We understand that our responsibility to safeguard children requires that we all appropriately share any concerns as soon as a staff member or volunteer suspects/knows of a concern that we may have about children. The first point of contact is the DSL or other members of the Safeguarding Team (in their absence). The DSL will inform the Headteacher of any referrals to be made. If any staff member is involved the report is made to the Headteacher. If the Headteacher is involved then the Chair of Management Committee should be informed.
- 7.2 If a staff member feels they cannot disclose information to their DSL, Headteacher or Management Committee), they must then follow our schools whistleblowing procedures to report their concerns. (**Appendix 6**).
- 7.3 All staff will be versed in our Whistleblowing procedure, understand when it is appropriate to use the procedures and will be given details of the NSPCC whistleblowing helpline.
- 7.4 All staff will be well versed in the school's Child Missing protocols and know and understand that any child that is regularly absent or missing can be a cause for concern and a possible indicator that the child is at risk of abuse or in need of help and support.



#### 8 - Roles and Responsibilities

#### 8.1 Designated Safeguarding Lead[5]

Keeping Children Safe in Education September 2019, Annex B, outlines specific responsibilities of the DSL (a member of the School's Leadership Team) and their responsibilities within this role. Our DSL (**Nicola Anderson**) takes **lead responsibility** for safeguarding and child protection and their key areas of responsibilities include:

#### **Managing referrals**

- Refer cases of suspected abuse and neglect to children's social care/police.
- The Channel programme where there is a radicalisation concern and support staff with this.
- Cases in relation to allegations against staff members to LADO including disclosure and barring
- Cases where any crime may have been committed to the Police.

#### **Work with Others**

- Liaise with other DSLs and the Management Committee, as appropriate, to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice and expertise for staff.

#### **Undertake Training**

- The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- Understand the assessment process for providing early help and intervention.
- Have a working knowledge of how local authorities conduct a child protection case conference.
- Ensure each member of staff has access to and understands the school's child protection policy and procedures.
- Are alert to the specific needs of children in need, those with special educational needs and young carers.
- Are able to keep detailed, accurate, secure written records of concerns and referrals.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.



- Understand and support the school with regards to the requirements of the Prevent duty and undertake Prevent Awareness Training.
- Recognise the additional risks that children with SEN and disabilities (SEND)
  face online, for example, from online bullying, grooming and radicalisation
  and are confident they have the capability to support SEND children to stay
  safe online.
- Obtain access to resources and attend any relevant or refresher training courses.

#### **Raising Awareness**

- Ensure the school's child protection policies are known, understood and used appropriately.
- Ensure the child protection policy is reviewed annually and is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made.
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

#### **Child Protection Files**

- Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.
- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims abuse and have that support in place for when the child arrives.
- During term time the designated safeguarding lead (or a deputy) will always be available on school site. The school will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

#### 8.2 Roles and responsibilities of the Headteacher

The Headteacher of Leicester City Primary PRU will ensure that:

- The policies and procedures adopted by the Management Committee are fully implemented, and followed by all staff.
- The Child Protection & Safeguarding Policy and other relevant policies are updated annually, ratified by the Management Committee annually and that relevant policies be available publicly either via the school website, parents evening, or by other means.



- Sufficient resources and time are allocated to enable DSL's and other staff to discharge their responsibilities; including taking part in inter-agency meetings and contributing to the assessment of children.
- That the Headteacher has attended Safer Recruitment Training and that training is refreshed no later than every 5 years; and that at least 1 member of the Management Committee has attended Safer Recruitment Training.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. (Whole school approach and child centred practice.)
- All staff consider the best interest of a child and are made aware that they
  have an individual responsibility for referring child protection concerns,
  promptly and using the proper channels.
- All staff have an understanding of Early Help and have the ability to identify children who would benefit from Early Help intervention.
- That regular external visitors/providers such as cleaners, caterers have shown
  the school a copy of their H & S and Child Protection guidelines as best
  practice and where applicable; and that the school has a statement in main
  reception notifying external visitors who the Schools DSL is and what to do if
  they have any concerns about a child's welfare.
- The DSL's undergo child protection training which is updated regularly, with advice from the LSCB, Safeguarding in Education and in line with Keeping Children Safe in Education, September 2019, Annex B.
- New members of staff, temporary or permanent including volunteers are given a full induction that includes Safeguarding and Child Protection Guidelines, and names of DSL's..
- That staff undergo and attend annual whole school training years (INSET).
- All staff are made aware of their right to whistleblow, have a copy of the whistleblowing procedures, are well versed with the procedures and have been made aware of the NSPCC whistleblowing helpline. (Appendix 6)

#### 8.3 Roles and responsibilities of the Management Committee

The Management Committee of Leicester City Primary PRU will ensure that:

- The school has a child protection & safeguarding policy and procedures in place, and the policy is made available to parents on request and available on the school website. <u>Leicester City Primary PRU</u>
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection – DSL.



- That all staff members working with children consider the best interests of children and are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection DSL.
- There is an appointed deputy(s) for child protection, in the event of the unavailability of the DSL.
- The DSL and the appointed deputy(s) for child protection undertakes training for designated safeguarding leads, in addition to inter-agency child protection training, that is provided by, or to standards agreed by, LSCB, and attends refresher DSL training at two-yearly intervals.
- The Headteacher, and all other staff and volunteers who work with children, undertake appropriate training which is kept up-to-date through Whole School Training (annually); and that new staff, temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities. (Through the induction process)
- There are procedures for dealing with allegations of abuse against members of staff and volunteers. (Appendix 3 & 6)
- The chair of Management Committee (or, in the absence of a chair, the vice chair) deals with any allegations of abuse made against the Headteacher, in liaison with the Local Authority Designated Officer. (Appendix 3 & 6)
- The Management Committee nor individual governors will have a role in dealing with individual cases or a right to details of cases except when exercising their disciplinary functions in respect of allegations against a member of staff.
- Any deficiencies or weaknesses brought to the attention of the Management Committee are rectified.
- Policies and procedures are reviewed annually, and information is provided to the Local Authority on how the Management Committee discharges its duties regarding safeguarding and child protection.
- There is an individual member of the Management Committee who will champion issues to do with safeguarding children and child protection within the school, liaise with the DSL, and provide information and reports to the Management Committee, and that person is appropriately trained to discharge their responsibilities effectively.
- Will ensure that school creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children (Part three: Safer Recruitment, Keeping Children Safe in Education September 2019).
- Will ensure that at least 1 member of the Management Committee has attended Safer Recruitment Training and that training is regularly refreshed.



 That the Chair of the Management Committee completes the annual Safeguarding in Education Check List – supporting schools to exercise their duties in relation to Safeguarding & Child Protection and return the document to the local authority.

#### 9 - Supporting Children

- We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, too aggressive or being withdrawn.

#### 9.1 Our school will support all students by:

- Encouraging the development of self-esteem and resilience in every aspect of school life including through the curriculum.
- Promoting a caring, safe and positive environment within the school.
- Ensuring children are taught to recognise when they are at risk and know how to get help when they need it, both physically and online.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children, including Early Help.
- Notifying Children's Social Care as soon as there is a significant concern.
- Ensuring that a named teacher is designated for Looked After Children/Children In Need (LAC & CIN) and that an up to date list of LAC/CIN is regularly reviewed and updated.
- Providing continuing support to a student (about whom there have been concerns) who leaves the school by ensuring that such concerns and school medical records are forwarded under confidential cover to the Head at the pupil's new school as a matter of urgency.
- Working with partner agencies to support and safeguard children within; Early Help, Children in Need, Child Protection and Looked After Children.
- The school will ensure that children are taught about safeguarding, including online safety. This will be a part of a broad and balanced curriculum. This will include covering relevant issues through Relationships Education and Relationships and Sex Education.



#### 10 - Confidentiality

We recognise that **all** matters relating to child protection are confidential and the best interest of a child should be considered at all times. However, the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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.

- 10.1 The Headteacher or DSL will disclose personal information about a pupil to other members of staff on a need to know basis only. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual student/family. A written record will be made of what information has been shared, with whom, and when.
- 10.2 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 10.3 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's own safety or well-being, or that of another child.
- 10.4 We will always undertake to share our intention to refer a child to Children's Social Care with their parent's/carer's consent unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Children's Social Care, Duty & Advice Service.

#### 11 - Supporting Staff

- 11.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 11.2 We will support such staff by providing an opportunity to talk through their anxieties and concerns with the DSL and to seek further support where necessary. This could be provided by, for example, the Headteacher, by Occupational Health and/or a teacher/trade union representative as appropriate.
- 11.3 We understand that staff should have access to advice on the boundaries of appropriate behaviour. Guidance for safer working practice for those working with children and young people in education settings, 2019 (Safer Recruitment Consortium).[6] provides advice on this and the circumstances which should be



avoided, in order to limit complaints against staff of abuse of trust, and/or allegations of physical or sexual abuse. These matters form part of staff induction and are referred to in the staff handbook/code of conduct.

11.4 We recognise that DSL's should have access to support (as in 11.2) and appropriate workshops, courses or meetings as organised or arranged through the Local Authority/LSCB.

#### 12 - Allegations against staff

- 12.1 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 12.2 All staff should be aware of the whole school <u>Behaviour Policy</u> and <u>Staff Code</u> of <u>Conduct</u>.
- 12.3 All staff should be aware of the Guidance for Safer Working Practices for Adults who work with Children and Young People 2019 [7].
- 12.4 All staff as part of their annual safeguarding training will receive E Safety Training and will sign the E-Safety Acceptable Use Agreement. This sets out responsibilities for all staff, ensuring they have an up-to-date awareness of e-safety matters and that all digital communications with students/parents/carers should be a professional level and only carried out using official school systems.
- 12.5 We understand that a pupil may make an allegation against a member of staff.
- 12.6 If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior teacher if the Headteacher is not present.
- 12.7 The Headteacher/senior teacher on all such occasions will immediately discuss the content of the allegation with the Local Authority Designated Officer and follow the process for managing the concern laid down in the LSCB Procedures (<a href="http://llrscb.proceduresonline.com/chapters/p\_alleg\_staff.html">http://llrscb.proceduresonline.com/chapters/p\_alleg\_staff.html</a>) and the School's Managing Allegations Policy.
- 12.8 If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Management



Committee who will consult with Children's Social Care, LADO, without notifying the Headteacher first. (0116 454 2440)

- 12.9 In all occasions identified in 12.7 & 12.8 above, the school will follow the LSCB/Local Authority procedures for managing allegations against staff and volunteers.
- 12.10 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult (as in 12.8 above) in making this decision.
- 12.11 In line with this policy and other school procedures for incident reporting/recording, staff and pupils may provide accounts of events which will be stored under our own secure systems and may be produced in the event of any allegation. However, such accounts must not constitute an official statement and the reporting person must not be questioned over their disclosure at this stage.
- 12.12 Our School staff are aware of and have an understanding of our 'Guidelines for Avoiding Allegations of Abuse' as outlined in **Appendix 4**.

#### 13 - Whistleblowing

- 13.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 13.2 All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the Chair of Management Committee or the Local Authority Designated Officer.
- 13.3 All staff are aware of and understand how to use our school's whistleblowing procedures. **Appendix 6**.
- 13.4 All staff have access to the NSPCC Whistleblowing Helpline.

#### 14 - Our role in the prevention of abuse

14.1 We recognise that the school plays a significant part in the prevention of harm to our pupils by providing pupils with effective lines of communication with trusted adults, supportive friends and an ethos of protection.

#### 14.2 The school community will therefore:



- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to. This includes considering the best interest of a child and maintaining the ethos of 'it could happen here'.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- We will provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.
- Relevant issues will be addressed through the PSHE curriculum, for example self-esteem, emotional literacy, assertiveness, power, sex and relationship education, e-safety and bullying.
- Relevant issues will be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art, ICT and E Safety (includes online and offline safety).
- All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole school approach.
- Our safeguarding policy cannot be separated from the general ethos of the school, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

14.3 Safeguarding children and young people is a local and national priority and within Leicester City Primary PRU, protecting children from abuse, harm and neglect is a priority. Our child protection & safeguarding policy through the school's values, ethos and behaviour policies provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other. Our staff are well versed with local and national guidance and are aware of emerging safeguarding concerns that could potentially harm our children and young people.

- Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- Our staff are supported to recognise the warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum.
- Our staff are aware of emerging issues and contextual safeguarding and take this into consideration when assessing children and young people's needs.
- Our school works with and engages our families and communities to talk about such issues.



- Our school staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- Our DSL knows where to seek and get advice as necessary.
- Our school brings in experts and uses specialist material to support the work we do.
- Our school staff fully understand how to raise a concern using the appropriate channels.

14.4 As Leicester City Primary PRU staff are aware that safeguarding issues can manifest themselves in many different ways, our staff have received annual safeguarding training and additional information to better equip themselves in the knowledge of other forms of abuse as per Keeping Children Safe in Education 2019. These are outlined in **Appendix 1**.

#### 15 - Safeguarding students who are vulnerable to extremism

- 15.1 Since 2010, when the Government published the Prevent Strategy[8] and (Revised Prevent Duty Guidance 2015[9]), there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 15.2 Leicester City Primary PRU values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 15.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Leicester City Primary PRU is clear that this exploitation and radicalisation should be viewed as a



safeguarding concern. Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in **Appendix 5**.

- 15.4 Leicester City Primary PRU seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to religious ideologies, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist extremist and Animal Rights movements.
- 15.5 Leicester City Primary PRU takes referrals from across the whole of Leicester City Education Authority. We recognise that Leicester as a whole is a very multicultural city. However, our children generally do not reflect this diversity and often come from specific areas across the city. Risk of radicalisation is assessed on an individual basis as children begin their transition process into the PRU.

#### 15.5 Risk reduction

- 15.6 The school Management Committee, the Head Teacher and the DSL's for Safeguarding will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, <u>SEND policy</u>, collective worship sta, the use of school premises by external agencies, integration of students by gender and SEN, <u>anti-bullying policy</u> and other issues specific to the school's profile, community and philosophy.
- 15.7 When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.
- 15.8 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.
- 15.9 Our staff have undergone Prevent Awareness Training and understand the steps to follow, via discussions with the DSL, if a referral to the Channel Programme is required.

#### 16 - Contextual Safeguarding and other forms of abuse

16.1 Safeguarding incidents can be associated with factors outside the school and can occur between children outside the school. Leicester City Primary PRU staff,



including our DSL's, endeavour to consider the context within which such incidents and/or behaviour occur. This is known as contextual safeguarding, which simply means Leicester City Primary PRU staff will take into consideration wider environmental factors that may be present in a child's life that are a threat to their safety and/or welfare. This way, schools are able to provide as much information as possible as part of the referral process to Children's Social Care as necessary (KCSIE 2019). Environmental factors with Contextual Safeguarding include, but not exclusively, the following.

#### 17 - County Lines

- 17.1 Criminal exploitation of children is a widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County Lines is a term used when drug dealers from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs.
- 17.2 A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and young adults often with mental health or addiction problems to act as drug runners or move cash so they can stay under the radar of law enforcement.
- 17.3 People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

#### 18 - Serious Violence, Gang Violence and Youth Crime

- 18.1 A gang is a group of individuals that spends time in public and engages in criminal activity and violence. The group may also be territorial or in conflict with other gangs. Young people involved in gangs have an increased risk of experiencing violence and other types of abuse, including sexual exploitation. Gang crime and serious youth violence is also often synonymous with knife crime and other serious violence.
- 18.2 The vast majority of young people and education establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact.



18.3 Gangs specifically target children who have been excluded from school to groom them as drug dealers in towns across the UK. Exclusion from school appears to be a highly significant trigger point for the escalation of County Lines involvement for children who might be on the fringes of such activity or who are easily manipulated.

#### 19 - Knife Crime

19.1 Knife crime has been receiving countrywide attention after being recognised as a contemporary national threat in the UK. There have been a number of high-profile incidents where teenagers have been killed or injured by someone using a knife as a weapon. Knife crime simply put is any crime that involves a knife. This includes:

- carrying a knife or trying to buy one if you're under 18;
- threatening someone with a knife;
- carrying a knife that is banned;
- a murder where the victim was stabbed with a knife; and
- a robbery or burglary where the thieves carried a knife as a weapon.

Within Leicester, May 2019 saw 237 reported incidents involving a knife or bladed instrument which was an increase of 30 from the previous month.

#### 20 - Child Criminal Exploitation and Cybercrime Involvement

20.1 Organised criminal groups or individuals exploit children and young people due to their skills and ability, in order to access networks/data for criminal and financial gain. There are a number of signs that may indicate a pupil is a victim or is vulnerable to being exploited which include;

- missing from education;
- show signs of other types of abuse/aggression towards others;
- have low self-esteem, and feelings of isolation or fear;
- lack trust in adults and appear fearful of authorities;
- have poor concentration or excessively tired;
- become anti-social:
- display symptoms of substance dependence;
- excessive time online computer/gaming forums;
- social isolation in school with peers;
- high functioning with an interest in computing.



#### 21 - Child Criminal Exploitation and Child Sexual Exploitation (CSE)

21.1 County Lines criminal exploitation is also synonymous with Child Sexual Exploitation. Criminal activity and gang association can lead into CSE through situations such as initiation and peer pressure, in addition to sexual favours. Although county lines is mainly criminal, all our staff are aware of the definitions of CSE, signs and impact on vulnerable children. This is further outlined in section 27 of this policy.

#### 22 - Modern Slavery and Trafficking

22.1 Slavery is an umbrella term for activities involved when one person obtains or holds another person in compelled service. The number of British children identified as potential victims of modern slavery has more than doubled in a year, prompting fresh concerns about child exploitation by county lines drugs gangs.

#### Someone is in slavery if they are:

- forced to work through mental or physical threat;
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';
- physically constrained or have restrictions placed on his/her freedom;
- 'slavery' is where ownership is exercised over a person;
- 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily;
- 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

#### 22.2 Human trafficking

22.3 Recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, use of force, or other forms of coercion, of abduction, of deception, of the abuse of power or of a position of vulnerability or of the giving/receiving of payments or benefits to achieve the consent of a person having control over another person; (where a child is involved, the above means are irrelevant). For the purposes of exploitation, which includes (but is not exhaustive):

- prostitution
- other sexual exploitation



- forced labour
- slavery (or similar)
- servitude etc
- removal of organs

#### 23 - Peer on Peer Abuse/Peer Influence

KCSIE 2019 is explicit in their definition of Peer on Peer abuse and its forms. However, within the context of contextual safeguarding, peer on peer abuse and peer influence has a massive impact on the child and young person (CYP). If CYP are exposed to other CYP who are known for being exploited, they are more likely to experience peer on peer abuse and be 'influenced/swayed' to participate in illegal activity, criminal activity and sexual activity. Further information on Peer on Peer abuse is outlined in section 28 of this policy.

#### 24 - Children and the Court System

- 24.1 Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children:
  - <u>5 11 year olds</u>
  - <u>12 17 year olds</u>

24.2 Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. If a child or young person from our school is in a situation where they are required to give evidence, school staff members will support the child and family members where appropriate.

#### 25 - Children with family members in prison

25.1 The imprisonment of a household member is one of ten adverse childhood experiences known to have a significant negative impact on children's long-term health and wellbeing, their school attainment, and later life experiences. Children may have to take on extra responsibilities at home, including becoming young carers in some situations.



- 25.2 These children are at risk of poor outcomes including stigma, isolation and poor mental health. Parental imprisonment is also associated specifically with negative school experiences, such as truanting, bullying and failure to achieve in education and children of prisoners are at a higher risk of mental ill health and have an increased likelihood of experiencing poverty compared to their peers.
- 25.3 Approximately 200,000 children have a parent sent to prison each year and as such, Leicester City Primary PRU staff members will support children and their family members if children from our school have family members in prison. In such cases, Leicester City Primary PRU will remain non judgemental and supportive towards the child and family so that they can achieve the best whilst in our environment. Furthermore, as if a parent or carer finds themselves in this situation, we encourage you to speak with our DSL so that support can be given as necessary.

#### 26 - Homelessness

- 26.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Our DSL's are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity if our children and families are experiencing homelessness. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.
- 26.2 Whilst referrals and/or/discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.
- 26.3 The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.
- 26.4 Furthermore, Leicester City Primary PRU staff also promote Early Help and Support (Section 24) so that children and families can be identified and supported at an early stage, If a parent or carer and/or their children find themselves in this situation, we strongly urge you to speak to our DSL or member of school staff so that support can be provided.



#### 27 - Other Forms of Abuse and Neglect

#### **Child Sexual Exploitation & Trafficking**

- 27.1 CSE involves young people receiving something in exchange for sexual acts. Sexual exploitation can take many forms ranging from seemingly consensual relationships to serious gang and group exploitation.
- 27.2 Leicester City Primary PRU staff are aware that sexual exploitation can take many forms and that pupils may not exhibit external signs of abuse. Our staff are also aware that it is an offence carrying a maximum sentence of two years imprisonment where an adult (any adult) intentionally communicates (for example, by e-mail, text message, written note or orally) with a child under 16 (whom the adult does not reasonably believe to be aged 16 or over) for the purpose of obtaining sexual gratification. This act forms part of Section 67 of the Serious Crime Act 2015 [10] (offence of Sexual Communication with a child) and came into force on 3 April 2017.
- 27.3 Therefore, our staff are vigilant for the less obvious signs, such as lots of new electronic equipment, when before there was none, seeming to have extra money to spend, moving away from established friendship groups, and the use of language appropriate/inappropriate for the child's age.
- 27.4 Our school staff are also aware of some of the signs and symptoms of CSE through LSCB Leaflets[11], staff induction and as part of annual whole school Safeguarding Training which is in addition to the CSE & Trafficking Course delivered through Children's Workforce Matters[12] that the DSL has attended.
- 27.5 Our school staff follow guidance and procedures as outlined in 'Safeguarding Children and Young People from Sexual Exploitation in Leicester, Leicestershire and Rutland[13]' available on the LSCB website.
- 27.6 Our school staff are aware that if a disclosure in raised in reaction to CSE, that it will be reported straight to the DSL/SLT or Duty & Advice in their absence.

#### 27.7 Grooming & Sexting can also form part of CSE both online and offline

27.8 Child sexual exploitation can occur in different ways and in different situations. Many young people are 'groomed' by their abuse, online or face-to-face. Grooming is an action deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions with the intention to sexually abuse them.



27.9 Groomers will hide their true intentions and may spend a long time gaining a child's trust through a range of mediums, including social media platforms. Section 67 of the Serious Crime Act 2015 (offence of Sexual Communication with a Child) which came into force on 3 April 2017 also applies to Sexting and Grooming and our staff are fully aware of the legislation[14].

#### Grooming models include:

- the relationship / peer model
- organised / network model & trafficking model
- inappropriate relationship model
- gangs model
- online gaming / social networks
- 27.10 Our staff are aware of the types of grooming which take place, including grooming models through their annual safeguarding training and information from DSL's.
- 27.11 Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. This can be via Peer on Peer or other adults. As recently as June 2017, figures show there have been more than 4,000 cases since 2013 where children have taken explicit pictures of themselves and sent them to others, the youngest being 5 years old, and research from Child Line suggests six out of ten teenagers say they have been asked for sexual images or videos. It is illegal to possess, take or distribute sexual images of someone who is under 18, even if the young person under the age of 18 has taken the image themselves and passed it on themselves.
- 27.12 Leicester City Primary PRU takes a zero tolerance approach if children are found to be sending sexual images of themselves or others whether intentionally or maliciously in our school. Leicester City Primary PRU has a duty of care to inform the Police and Children's Social Care if such a case occurs. We will also notify parents directly if their children are involved. In addition to supporting our children with being safe in a digital world and highlighting the dangers, our staff have also been issued with government guidance on sexting Sexting in Schools and Colleges 2016
- 27.13 Leicester City Primary PRU will follow through school procedures in reporting such concerns and promote E safety and the dangers of sexting, grooming and CSE through lessons, PSHE and assemblies. Our pupils are taught how to keep safe on and off line and E safety is promoted throughout the school and home environment. Our school have also discussed local and national cases where grooming of young



children has taken place, such as the Kayleigh Haywood story, to highlight the dangers.

27.14 Our E safety policy is highlighted to staff, pupils and parents, and is available on our school's website including our acceptable usage policy.

## 28 - Sexual violence and Sexual Harrassment between children including Peer on Peer Abuse / Children using Abusive Behaviour[15] (CUSAB)

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harrassment;
- sexting (also known as youth produced sexual imagery);
- upskirting; and
- initiation/hazing type violence and rituals.
- 28.1 Sexual violence and sexual harrassment[16] 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. 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.
- 28.2 Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ children are at greater risk.
- 28.3 Leicester City Primary PRU takes Peer on Peer abuse seriously and we understand that some children are more vulnerable to physical, sexual and emotional bullying and abuse by their peers. In our school, this kind of abuse will always be taken as seriously as abuse perpetrated by an adult and as seriously as a child who is suffering or likely to suffer significant harm.
- 28.4 Our staff understand that a significant proportion of sexual related offences are committed by teenagers and, on occasion, such offences are committed by younger



children. Our staff therefore understand not to dismiss some abusing sexual behaviour as 'normal' between young people and not to create high thresholds in such cases before appropriate action is taken.

- 28.5 Staff and carers of children living away from home need clear guidance and training to identify the difference between consenting and abusive, and between appropriate and exploitative peer relationships. Our school will provide information, guidance and training to relevant staff members to support them with this.
- 28.6 Children and young people who abuse others should be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others, and our school has clear guidelines around this.
- 28.7 Our school also refers to the LSCB procedures (Chapter 2.2)[17] which are written with particular reference to sexually abusive and inappropriate behaviours. Keeping Children Safe in Education 2019 (Part 5) also makes reference to Peer on Peer abuse and Sexual Harassment and Violence and where there are serious child protection concerns, as a result of non-sexual violence by a child or young person, leading to actual or possible signficant harm, our safeguarding and child protection measures will be implemented.

#### 29 - Upskirting

29.1 Upskirting is the act of taking a photograph of underneath a person's skirt without their consent. It's often performed in a public place, on public transport or on an escalator, with crowds of people making it harder to spot people taking these photos. It could also happen on the way to and from school and within a school. Being victim to such an incident can cause emotional distress for the young child or young person involved. Leicester City Primary PRU take these types of incidents seriously and our staff are aware of the law against 'Upskirting' which came into force on 12 April 2019 in England and Wales. If our staff are made aware of such incidents, the school will follow its safeguarding procedures in addition to seeking advice from the Police.

29.2 At Leicester City Primary PRU all our staff are aware of the importance of:

- making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'; and



 challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, upskirting and lifting up skirts.
 Dismissing or tolerating such behaviour risks normalising them and serious action will be taken.

29.3 If our staff have a concern that a child might have been abused by another child and/or is displaying inappropriate sexualised behaviour we will in the first instance refer their concerns to the DSL. The DSL will then directly contact Children's Social Care/DAS in accordance with the LSCB Referrals Procedure[18] to decide how the incident will be managed. Furthermore, our DSL will also seek advice from the Police where necessary. Our staff are aware of what Peer on Peer abuse and Sexual Violence/Harassment is at national and local levels through our annual whole school training and our DSL has attended CUSAB training delivered by Safeguarding in Education to enhance their knowledge in this area further.

### 30 - Domestic Violence and Abuse & Violence between young people (Teen relationships)

30.1 The cross-government definition of domestic violence and abuse is[19]:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

30.2 There have been a number of high profile cases, both locally and nationally, where domestic violence has had a significant and direct impact on the child and their wellbeing. If the school is made aware of incidents of domestic violence which is impacting on a child within the school, (suspicions and allegations of abuse, harm and significant risk to a child), the school will follow Local Authority and Leicester Safeguarding Board guidelines in reporting such concerns to Children's Social Care, Duty and Advice and will seek further guidance where necessary.

30.3 Domestic abuse is not limited to adults; there is an increasing awareness of violence from one teenager to another.



- 1 in 5 teenage girls have been assaulted by a boyfriend.
- Young women are more likely to experience sexual violence than other age groups.
- Young women with older partners are at increased risk of victimisation.
- Recent surveys (including NSPCC[20], Zero Tolerance and End Violence Against Women campaign) reveal that approximately 40% of our young people are already being subjected to relationship abuse in their teenage years.

30.4 If Leicester City Primary PRU is made aware of children behaving this way with other children within our school, and violence is apparent between the young people's relationship (this includes issues around the use of social media and sexting), we will view this as a significant child welfare concern and where necessary, the appropriate agencies will be informed. This includes Children's Social Care and the Police.

30.5 If such cases are prevalent within our school, whether the incident involves adult or teen relationships, the school will work closely with the child and Headteacher/DSL will endeavour to support the child who has been exposed to this type of violence and abuse with the involvement of (where appropriate) their parents/carers and their boyfriend/girlfriend.

30.6 Furthermore, involvement through the Early Help Offer can also support the child and parents/carers and the school will ensure communications and multiagency working with Social Care and Early Help is maintained to fully support the child and their family (victims). Staff will also work with all the children in our school to ensure information and the importance of healthy relationships is highlighted through assemblies, circle time and PSHE lessons.

#### 31 - Child Missing from Education

- 31.1 A Child Missing from Education forms part of the wider LSCB procedures[21] (Chapter 2.10) for children who go missing from School, Home, Care Education and includes Families who go missing.
- 31.2 A pupil missing from education on a number of occasions is a potential indicator of abuse and neglect.
- 31.3 Should a pupil go missing from Leicester City Primary PRU, our school's Attendance Officer (**Dinah Francis**) will inform the DSL/SLT and contact the



Educational Welfare Service. The DSL will consider further actions and/or support should it be required and to ensure they help identify any risk of abuse and neglect, including sexual exploitation and to help prevent the risks of them going missing in future.

- 31.4 Where a child is no longer coming to school where the parent/carer has removed them, the school will ensure that appropriate steps are taken and measures are in place. I.e. we will follow our school guidelines in monitoring those parents/carers home tutoring, follow procedures where a child is taken out of school to go on holiday, where a child is removed from school as the family are moving away.
- 31.5 We will notify all relevant partner agencies/services including Education Welfare, correct forms will be completed, information will be recorded and child folders/information will be passed on to the appropriate person (where applicable).

#### 32 - Honour Based Violence (HBV)

- 32.1 Honour-based Violence is a term that embraces a variety of crimes of violence (mainly but not exclusively against women) including domestic abuse, which is perpetrated in the name of so called 'honour'. The honour code which it refers to is set at the discretion of male relatives and women who do not abide by the 'rules' are then punished for bringing shame on the family. Infringements may include a woman having a boyfriend, rejecting a forced marriage, pregnancy outside of marriage, interfaith relationships, seeking divorce, FGM, forced marriage, abuse linked to faith and culture, breast ironing, inappropriate dress or make-up and even kissing in a public place.
- 32.2 HBV can exist in any culture or community where males are in a position to establish and enforce women's conduct. However, males can also be victims, sometimes as a consequence of a relationship which is deemed to be inappropriate, if they are gay, have a disability or if they have assisted a victim.

#### 33 - Female Genital Mutilation (FGM)

33.1 Female Genital Mutilation is an illegal operation under the Female Mutilation Act 2003, is a form of child abuse and as such, is dealt with under the school's Child Protection & Safeguarding Policy.



#### 33.2 Definition of Female Genital Mutilation[22] (FGM):

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Therefore, our staff have been briefed on the importance of FGM through our annual whole school Safeguarding and are aware of some of the signs and symptoms.

Responding to FGM - The school will ensure;

- We raise awareness of staff in regard to the issues of FGM through Whole School Training;
- Staff have a clear understanding of what FGM is;
- FGM is within the school's Safeguarding Policy;
- Sex and Health curriculum supports pupils understanding of their bodies and keeping themselves safe; and
- Monitoring absences.
- 33.3 From October 2015, it is a mandatory responsibility of all staff members to report any suspicion of FGM to the police if the child is under 18 years of age. If any of our staff at Leicester City Primary PRU are aware of such concerns, staff will, in the first instance, report their concerns to the DSL and/or Headteacher and then take appropriate steps to either directly contact the Police or seek advice from Duty & Advice or Children's Social Care.
- 33.4 Any concerns raised, including any referrals made, will be monitored closely and recorded following our school's procedures by the staff members raising the concern, the DSL or both.

#### 34 - Forced Marriage

34.1 A forced marriage is a marriage that is performed under duress and without the full and informed consent or free will of both parties. Duress cannot be justified on religious or cultural grounds. Victims of forced marriage may be the subject of physical violence, rape, abduction, false imprisonment, enslavement, emotional abuse, and murder. It is important not to confuse 'forced' marriage with 'arranged' marriage. In the instance of an 'arranged' marriage both parties freely consent.



#### 34.2 The Government's definition of a Forced Marriage[23] is;

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

- 34.3 Leicester City Primary PRU staff, through induction and whole school training are aware of the importance and impact on a child/student who is involved in such situations.
- 34.4 In addition, the Forced Marriage Unit have issued guidance on Forced Marriage and vulnerable adults due to an emerging trend of cases where such marriages involving people with learning difficulties. This is not a crime which is perpetrated by men only, sometimes female relatives will support, incite or assist. It is also not unusual for younger relatives to be selected to undertake the abuse as a way to protect senior members of the family. Sometimes contract killers and bounty hunters will also be employed.
- 34.5 In such cases, disclosures and concerns relating to Forced Marriage/Honour Based Violence will be reported directly to the DSL and the Police due to the impact it could have on the child/student in the wider community. Information will be sought from Children's Social Care / Duty and Advice where appropriate, and the Police and the Forced Marriage Unit

#### 35 - Abuse linked to Faith, Beliefs and Culture

35.1 Child abuse is never acceptable in any community, in any culture, in any religion, under any circumstances. However, some children are subject to certain kinds of child abuse linked to their faith, belief or culture and this includes abuse that might arise through a belief in spirit possession or other spiritual or religious beliefs.

This kind of abuse can also include:

- belief in the concept of witchcraft, magic or voodoo;
- demons or the devil acting through children or leading them astray;
- the evil eye or djinns and dakini;
- ritual or muti murders;
- breast ironing;
- Female Genital Mutilation;
- Honour based violence and Forced marriage;



chastisement of a child in a place of worship.

35.2 Whilst this is not an exhaustive list, Leicester City Primary PRU recognises that sadly such cases are on the increase within the community and, as a school, we take such incidents as seriously as any other kind of abuse perpetrated by an adult on a child.

35.3 If the school has been made aware of such a case, the school will follow LSCB procedures and, where appropriate, report the incident to Children's Social Care and/or the Police.

35.4 As a school, our staff are aware of some of the signs of this kind of abuse and have attended training to support them further. We also work closely with all our children to promote healthy relationships and British Values. Our ethos and code of conduct also teaches our children mutual respect of other faiths, beliefs and cultures in a positive manner rather than negative. We believe and respect each other in our school and maintain this ethos throughout the teaching and learning environment.

#### 36 - Early Help and Supporting children and their families

36.1 Early Help and prevention is about how different agencies work together to help children, young people and their families at any point in their lives to prevent or reduce difficulties. This means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

36.2 At Leicester City Primary PRU, key staff members and DSL's have attended LSCB's Early Help and Early Help Assessment training, and our staff are prepared to identify any children who may benefit from Early Help (either signpost or refer).

#### 37 - Bullying and Safeguarding

37.1 The Law - Some forms of bullying are illegal and should be reported to the Police. These include:

- violence or assault;
- theft;
- repeated harassment or intimidation, for example name calling, threats and abusive phone calls, emails or text messages; and
- hate crimes.



37.2 Bullying is defined as 'behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally'. Repeated bullying usually has a significant emotional component, where the anticipation and fear being bullied seriously affects the behaviour of the victim.

37.3 It can be inflicted on a child by another child or adult. Bullying can take may forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

37.4 Leicester City Primary PRU has a legal duty to ensure that we have an <a href="Anti-Bullying policy">Anti-Bullying policy</a> in place and that all staff, children and parents/carers are made aware of it. This document can be accessed on our school website (<a href="www.pru.leicester.sch.uk">www.pru.leicester.sch.uk</a>) and sets out clear procedures in managing such incidents within the school. We also deliver work in school about anti-bullying through assemblies and lessons and our staff are trained in appropriately dealing with such incidents.

37.5 However, at times, bullying such as Peer on Peer abuse, sexualised behaviour, serious incidents of harm, homophobic behaviours, cyber bulllying and sexting/use of mobile phones will be taken seriously and as a serious safeguarding concern, expecially if the child is at risk of significant harm. In such cases, our DSL's and the Headteacher will assess the situation and seek advice and guidance from Children's Social Care or the Police, especially in relation to illegal activity.

#### 38 - Local Priorities

38.1 Within Leicester City, the Local Authority and LSCB have their own priorities which reflect the area in which Leicester City Primary PRU is based. Some of these include being aware of knife crime, gang related issues, radicalisation, county lines, criminal activity, antisocial behaviour, FGM and contextual safeguarding. This is not an exhaustive list.

38.2 Within our local community, our priorities are:

- neglect;
- child sexual exploitation (CSE);
- female genital mutilation (FGM);
- Prevent;



- Early Help; and
- the Voice of the child.

38.3 Our SLT, DSL's and staff are aware of these priorities and we aim to raise awareness through a whole school approach and staff training to ensure our children and young people are aware of such issues, and that we implement the correct policies and procedures to ensure that our children and young people are safe within school and within the community we serve. We work closely with other agencies including the Police, Community Groups and Social Care, and where appropriate parents/carers will also be part of this whole school and whole community approach process.

# 23 - Private Fostering

39.1 A privately fostering arrangement is one that is made without the involvement of the Local Authority to look after a child under the age of 16 (or under 18 if the child has a disability) by someone other than a parent or close relative for 28 days or more and can include those living with extended family members, So this could be a child living with people as stated below:

Private Fostering <b>includes</b> a child living with:	Private Fostering does not include a child living with:
Godparents	Mother/Father
Great Grandparents	Brothers/Sisters
Great Aunts or Uncles	Grandparents
Family Friends	Aunts/Uncles
Step parents where a couple isn't married or in a civil partnership	Step parents where a couple is married or in a civil partnership
Cousins	Children and young people who are being looked after by the Authority
A host family which is caring for a child from overseas while they are in education here	

39.2 It is a legal duty (Children Act 1989) for parents or the private foster carer to notify the Local Authority of whenever a child is not living with a close relative. This



should be done six weeks before the arrangement takes place or immediately if it is unplanned or already happening. This is so the local authority can work with private foster carers to keep children safe and also support anyone who is privately fostering.

39.3 Leicester City Primary PRU staff are aware of what Private Fostering is and staff in our school understand their legal duty under the Children Act 1989 to notify the Local Authority/Children's Social Care and make them aware of such cases. Leicester City Primary PRU understands the apprehension some carers may feel in raising such concerns and the difficulty that some carere may have if faced with this situation. As such, the school and staff will endeavour to support carers and the child to ensure the wellbeing of the child is maintained, and help and advice is made available.

# 40 - Online Safety

40.1 The use of technology has become a significant component of many safeguarding issues eg child sexual exploitation, radicalisation and sexual predation. Technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racist or radical and extremist views;
- contact being subjected to harmful online interaction with other users, for example commercial advertising as well as adults posing as children or young adults; and
- conduct personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, or online bullying.

#### 40.2 Education

The school will do everything that we reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the school will teach children how to be safe online using the government guidance[24] and other resources.



#### 40.3 Filtering and monitoring

The school will ensure we have appropriate filters and monitoring in place.

The appropriateness of any filters and monitoring systems and will be informed in part by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what 'appropriate' filtering and monitoring might look like.

Guidance on e-security is available from the National Education Network.

Whilst filtering and monitoring is an important part of the online safety picture, it is only one part.

The school will consider a whole school approach to online safety. This will include a clear policy on the use of mobile technology in the school. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular, and the school will carefully consider how this is managed on our premises.

#### 40.4 Staff training

The school will ensure that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

#### 41 - What we do when we are concerned about a child?

- 41.1 Where risk factors are present but there is no evidence of a particular risk then our DSL/SLT advises us on preventative work that can be done within school to engage the student into mainstream activities and social groups. The DSL/SLT may well be the person who talks to and has conversations with the student's family, sharing the school's concern about the young person's vulnerability and how the family and school can work together to reduce the risk.
- 41.2 In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible).
- 41.3 The DSL can decide to notify Duty and Advice, Early Help or Family Support Services so that a strategic overview can be maintained and any themes or common factors can be recognised; and the school will review the situation after taking appropriate action to address the concerns.



- 41.4 The DSL will also offer and seek advice about undertaking an early help assessment and/or making a referral to Early Help services.
- 41.5 In addition to the above, our School staff will refer to **Appendix 2** 'Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child' when dealing with a child disclosure or an allegation of abuse.

# 42 - Policy review

The Management Committee of our school will review the Child Protection and Safeguarding Policy annually.

#### 43 - Other Relevant Policies

Our school's Management Committee's legal responsibility for safeguarding the welfare of the children in our school goes beyond child protection. Their duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Children's behaviour management, including drug/alcohol use;
- Staff behaviour and management (Code of Conduct; Safer Working Practice);
- Parents behaviour and management (Code of conduct when in school);
- Racist incidents and Homophobic Behaviour;
- Anti-bullying including Peer Abuse and Children Using Sexually Abusive behaviour;
- Physical interventions/restraint;
- Special Educational Needs, Mental Health Issues and Disabled Children;
- Trips and visits;
- Work experience and work related learning placement;
- First aid and the administration of medicines;
- Health and safety & Site security;
- Sex and Relationship Education/Underage Sexual Activity (Healthy Relationships and Domestic Violence in Young People)
- Equal opportunities
- ICT and E-safety, including on and offline and acceptable usage
- Extended School Activities
- Mobile phone and camera use (digital equipment)
- Looked After Children policy
- Whistleblowing Procedures (**Appendix 6**)



The above list is not exhaustive and when undertaking development or planning of any kind the school and its Management Committee will need to consider the implications for safeguarding children and promoting their welfare.

# 44 - Useful contact numbers and links

Nicola Anderson - Headteacher/DSL	0116 208 1470 07377 735761
Zaheera Omar-Davies - Deputy Headteacher	0116 208 1470 07377 449737
Bruce Wells - Chair of Governors	0116 282 4368 0116 208 1470
Dawn Solla - Safeguarding Lead Governor	0116 287 2487 0116 208 1470
Sophie Maltby - SEND Governor	0116 454 4650 0116 208 1470
Leicestershire Police	999 / 0116 2222222
One Front Door Duty & Advice (Inc out of hours) das.team@leicester.gov.uk Early Help & Support early-help@leicester.gov.uk	0116 454 1004
Children's Safeguarding Unit	0116 454 2440
Safeguarding in Education Julie Chapaneri & Mohammed Patel Safeguardingineducation@leicester.gov.uk	0116 454 2440
Local Authority Designated Officer (LADO) Jude Atkinson	0116 454 2440
Leicester Safeguarding Children's Board (LSCB) http://www.lcitylscb.org/	0116 454 6520
Prevent (Advice / Referral) City: Ailsa Coull - Ailsa.Coull@leicester.gov.uk	0116 454 6923 07519 069833
UAVA - United Against Violence and Abuse (Domestic violence, abuse between teenagers and domestic violence in BME community) info@uava.org.uk	0808 80 2000 28
Forced Marriage Unit	020 7008 0151



fmu@fco.gov.uk	
Female Genital Mutilation helpline fgmhelp@nspcc.org	0800 028 3550
NSPCC Whistleblowing Advice Line help@nspcc.org.uk	0800 028 0285

www.thinkuknow.co.uk
www.disrespectnobody.co.uk
www.saferinternet.org.uk
www.internetmatters.org
www.pshe-association.org.uk
www.educateagainsthate.com
www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisatio
n

# **Appendices**

- 1 Definition and Indicators of Abuse
- 2 Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child: for all staff members
- 3 Allegations about a member of staff/volunteers
- 4 Guidelines for avoiding allegations of abuse: for all staff members
- 5 Indicators of vulnerability to radicalisation
- 6 Whistleblowing Procedures



- [1] 'Staff' covers ALL adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children
- [2] https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/419604/What\_to\_do\_if you re worried a child is being abused.pdf
- [3] Keeping Children Safe in Education September 2019
- [4] Safer Working Practice 2019 safer recruitment consortium
- [5] Keeping Children Safe in Education September 2019 Annex B Role of Designated Safeguarding Lead
- [6] Safer Working Practice 2019 safer recruitment consortium
- [7] Safer Working Practice 2019 safer recruitment consortium
- [8]https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/97976/prevent-strategy-review.pdf
- [9] Revised Prevent Duty Guidance 2015

https://www.gov.uk/government/publications/prevent-duty-guidance

[10] Section 67 Serious Crime Act 2015

https://www.gov.uk/government/publications/circular-201701-sexual-communication-with-a-child-implementation-of-s67-of-the-serious-crime-act-2015

- [11] Child Sexual Exploitation (CSE), Trafficking & Missing LSCB
- [12] Children's Workforce Matters
- [13] <a href="http://llrscb.proceduresonline.com/pdfs/cse\_guidance.pdf#search="CSE" http://llrscb.proceduresonline.com/pdfs/cse\_guidance.pdf#search="CSE"</a>
- [14] Section 67 Serious Crime Act 2015

https://www.gov.uk/government/publications/circular-201701-sexual-communication-with-a-child-implementation-of-s67-of-the-serious-crime-act-2015

#### [15] LSCB CUSAB Procedures

http://llrscb.proceduresonline.com/chapters/p abuse child yp.html# refer

- [16] Sexual violence and sexual harassment between children in schools and colleges
- [17] http://llrscb.proceduresonline.com/chapters/contents.html
- [18] LSCB Referrals

https://llrscb.proceduresonline.com/chapters/p\_referr.html?zoom\_highlight=referrals

[19] <a href="https://www.gov.uk/guidance/domestic-violence-and-abuse">https://www.gov.uk/guidance/domestic-violence-and-abuse</a>

[20]

<u>www.nspcc.org.uk/services-and-resources/research-and-resources/pre-2013/partner-exploitation-and-violence-in-teenage-intimate-relationships/</u>

- [21] http://llrscb.proceduresonline.com/chapters/contents.html
- [22] Multiagency Practice Guidelines: FGM -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/800 306/6-1914-HO-Multi Agency Statutory Guidance.pdf



[23] https://www.gov.uk/guidance/forced-marriage

[24] Teaching online safety in schools https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/811 796/Teaching\_online\_safety\_in\_school.pdf

[25] Keeping Children Safe in Education September 2019

[26] LSCB Procedures - supporting disabled children <a href="https://llrscb.proceduresonline.com/chapters/p\_abuse\_disabld.html">https://llrscb.proceduresonline.com/chapters/p\_abuse\_disabld.html</a>



#### **APPENDIX 1 - DEFINITION AND INDICATORS OF ABUSE**

#### 1. NEGLECT

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers

Neglect is a priority for Leicester, Leicestershire and Rutland LSCB. Neglect has been identified as a feature in national and local Serious Case Review's (SCR's), local learning reviews and multi-agency audits. Our local LSCB have developed a Neglect Toolkit to support practitioners identify neglect earlier in families. Key staff members and DSL's in our school are versed with this document and understand when to use it.



#### 2. PHYSICAL ABUSE

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fabricated or Induced illnesses (Munchausen Syndrome by Proxy)
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

#### 3. SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse, as can other children.



The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

#### 4. SEXUAL EXPLOITATION

Child sexual exploitation occurs when a child or young person, or another person, receives "something" (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children's social care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this
  may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.

#### 5. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child



opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communication suddenly (known as "traumatic mutism") can indicate maltreatment.

#### 6. Sexual Harassment and Sexual Violence[25]

#### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003105 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.



**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

#### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Non-consensual sharing of sexual images and videos;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media: and
  - Sexual exploitation; coercion and threats



#### The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

#### 7. RESPONSES FROM PARENTS

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;
- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation of minor injuries;
- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Severe chastisement of a child including withholding food and using food as a form of punishment;
- Parents request removal of the child from home; or
- Violence between adults in the household.

#### 8. SEND CHILDREN (Special Educational Needs and Disabilities)

Leicester City Primary PRU is an inclusive school and welcomes all pupils including those with SEND. We believe in providing every possible opportunity to enable our pupils to develop their full potential whilst promoting their self-esteem and valuing their individuality.

Some children have barriers to learning that mean they have special needs and require particular action by the school. Our dedicated SENCO and teachers take account of these requirements and make provision, where necessary, to support



individuals or groups of children and thus enable them to participate effectively in curriculum and assessment activities.

#### Key issues for safeguarding children with disabilities include:

- social isolation
- reliance on others for personal care
- impaired capacity to resist or report abusive behaviour
- reduced access to someone to tell
- especially vulnerable to bullying and intimidation
- more frequently away from home, eg hospital, respite care or residential living.

Our SENCO and teachers have attended appropriate training as part of their CPD - whole school safeguarding training to understand the vulnerability of SEND children and to understand that SEND children may be at higher risk of abuse or neglect.

#### Some indicators of concerns could include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child's means of communication;
- Ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting;
- Invasive procedures which are unnecessary or are carried out against the child's will;
- A lack of knowledge about the impact of disability on the child;
- A lack of knowledge about the child, eg not knowing the child's usual behaviour;
- Not being able to understand the child's method of communication;
- Confusing behaviours that may indicate the child is being abused with those associated with the child's disability;
- Denial of the child's sexuality
- Behaviour, including sexually harmful behaviour or self-injury may be indicative of abuse:
- Being aware that certain health/medical complications may influence the way symptoms present or are interpreted.



Leicester City Primary PRU has a specific SEND policy. All our staff have access to this policy and key staff members are also aware of the LSCB Procedures[26] online. As best practice our school will ensure we:

- Provide starting points for the development of an appropriate curriculum
- Identify and focus attention on action to support the child within the class
- Use the assessment processes to identify any learning difficulties
- Ensure ongoing observations and assessments provide regular feedback about the child's achievements and experiences to form the basis for planning the next steps of the child's learning
- Help disabled children make their wishes and feelings known in respect of their care and treatment
- Ensure that disables children receive appropriate personal, health and social education (including sex education)
- Make sure that all disabled children know how to raise concerns, and giving them access to a range of adults with whom they can communicate
- Those disabled children with communication impairments should have available to them at all times a means of being heard
- Close contact with families, and a culture of openness on the part of services
- Guidelines and training for staff on good practice in intimate care, handling difficult behaviour, consent to treatment, anti-bullying strategies, and sexuality and sexual behaviour among young people
- Guidelines and training for staff working with disabled children aged 16 and over to ensure that decisions about disabled children who lack capacity will be governed by the Mental Health Capacity Act once they reach the age of 16
- Use specialist service needs/multi-agency approach if as a school we feel additional support, resources and interventions are required.



# APPENDIX 2 - PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD: FOR ALL STAFF MEMBERS

Teachers are in a unique position to identify and help children who may be being abused. Although all schools are required to have a named designated teacher with responsibility for co-ordinating child protection, this should not diminish the role all teachers have in protecting children. Child abuse usually comes to the attention of teachers in one of four ways:

- a direct allegation from the child being abused,
- a third party (e.g. friend, classmate) report,
- through the child's behaviour
- or through observation of an injury to the child.

When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. You may ask questions of a clarifying nature – such as 'who, what, where, when, how?' or use the acronym TED – 'Tell me, 'Explain it to me', Describe it to me.'

Remember, the way in which you talk to the child may have an effect on any subsequent legal proceedings. You need to be open and non-judgemental. Children making disclosures should be reassured and, if possible at this stage, should be informed what action will be taken next.

As soon as possible write a dated and timed note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead (DSL). It is important to act swiftly to avoid delays.

As a general guide, it is important to remember the following:

**SECRETS** - A child's trust can place a heavy responsibility on teachers, particularly if they want the abuse to remain a secret. You should tell the child that if he or she is being hurt you will need to tell other people. The child may need to be reassured that you will only speak to those who need to know and that they will treat the matter confidentially.

**LISTEN** - Listen carefully to the child. Take what he or she says seriously as it is rare for a child to make entirely false allegations



**REASSURE** - Reassure the child that he or she was right to tell and is not to blame for what happened, but do not promise confidentiality.

**RECORD** - As soon as possible after talking with the child, make a written record of what was said at the time, when and where the conversation took place and who was present. This must be accurate and not interpretation or assumption. Note any colloquial/slang words used by students and any language/behaviour inappropriate for the child's age – do not convert them into proper terms. Remember this may be used in any subsequent legal proceedings so note down too, how the child was behaving and the way in which they told you what was happening. This may indicate how the child was feeling.

For injuries in specific areas, record the location accurately – DO NOT take photographs or examine the child yourself.

**SUPPORT** - Get support for yourself. Listening to abused children can be very upsetting, and giving the child help may be difficult, if you are not given support yourself. Experience of working with children is not, in itself, preparation for the distress abuse can raise.

**REMEMBER** - It takes courage and determination for a child to tell an adult that they are being, or have been, abused. When they do tell someone, it is usually a person who they feel they can trust and whom they feel is reliable. For reasons of confidentiality, only those people who need to know about the abuse should be told, and conversations about the child should always be held in private.

If the concern involves the conduct of a member of staff or volunteer, a visitor, a governor, a trainee or another young person or child, the DSL/Headteacher must be informed asap; if the concern is in reaction to your Headteacher, you must speak to your Management Committee. If you feel you cannot speak with your Management Committee, you must use your whistleblowing procedure and contact Duty & Assessment/LADO for advice and support.

**NB** It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.



#### APPENDIX 3 - ALLEGATIONS ABOUT A MEMBER OF STAFF OR VOLUNTEERS

1. Inappropriate behaviour by staff/volunteers could take the following forms:

#### Physical

 For example the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.

#### Emotional

 For example intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexualit.

#### Sexual

 For example sexualised behaviour towards students, sexual harassment, sexual assault and rape.

#### Neglect

- For example failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- 2. If a child makes an allegation about a member of staff, governor, visitor or volunteer the Headteacher should be informed immediately. The Headteacher should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Headteacher should not carry out the investigation him/herself or interview students.
- 3. The Headteacher must exercise, and be accountable for, their professional judgement on the action to be taken, as follows
  - If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Headteacher will notify the Local Authority Designated Officer (LADO) Team.
  - The LADO Team will liaise with the Chair of Governors and advise about action to be taken, and may initiate internal referrals within children's social care to address the needs of children likely to have been affected.
  - If the actions of the member of staff, and the consequences of the actions, do
    not raise credible child protection concerns, but do raise other issues in
    relation to the conduct of the member of staff or the student (s), these should
    be addressed through the school's own internal procedures.



- If the Headteacher decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child protection file.
- 4. Where an allegation has been made against the Headteacher, then the Chair of the Management Committee takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of the procedure, please refer to the LSCB Website and refer to your Whistleblowing Procedures (**Appendix 6**).



# APPENDIX 4 - GUIDELINES FOR AVOIDING ALLEGATIONS OF ABUSE: FOR ALL STAFF MEMBERS

Whilst they may in common law be regarded as acting in loco parentis, teachers and carers in school should remember that they are not able to take the place of parents in providing physical comfort. This is not to say that all physical contact is inappropriate, rather that the professional context demands circumspection and a sense of fitness for purpose.

Teachers of very young children of nursery and Key stage 1 age will naturally need to engage in more physical contact than teachers of older children. Comforting a distressed child who may just have started school will not be an unusual occurrence. Similarly, in the special school setting, some children may tend towards demanding physical attention. In such circumstances, the contact by the adult will be for reassurance and may involve physical closeness (e.g. holding the child's hand or placing hands on the child's shoulders). Hugging and kissing would be inappropriate for other than the parent, even though the child may want to initiate it.

Administration of medicines and first aid requires careful codes of conduct and procedures. These should be laid down by local authority or health authority or in individual school guidelines and followed meticulously. As a rule of thumb, teachers should not administer medicines. If the child had an adverse reaction to a medicine given by a teacher, the teacher could be held liable and charged with negligence.

Administration of first aid should be undertaken by a qualified first aider. Where none is available, the minimum steps should be taken to ensure the child's safety and emergency services should be called.

Teachers may sometimes be called upon to intervene physically if a child or children are in danger of injuring themselves or others - as in a fight in the school yard. It is important that in such circumstances the minimum possible reasonable force is used. Where possible another colleague should be called upon to assist, both to minimise the risk of injury to the teacher intervening and to act as witness that reasonable force and no more was used. After such an event a clear record of what took place should be made, including where possible statements from witnesses. The Headteacher should be informed.

One-to-one situations with pupils need to be carefully and consciously managed. Some teaching, as with peripatetic music staff, may often suggest one-to-one organisation. Where pupils can be paired for such lessons, it is preferable. Where this is not possible and in other situations of individual interviews with pupils, it is advisable to use a room with a window where others can see in or to leave the door



open. If confidentiality makes this difficult, then another member of staff should be informed that the interview is taking place.

If a child becomes distressed, support and re-assurance should be offered through calming words rather than through physical contact. Teachers should not become involved with children's personal problems beyond listening and being sensitive to them in order to refer the child to the most appropriate source of help or counselling.



#### APPENDIX 5 - INDICATORS OF VULNERABILITY TO RADICALISATION

- 1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- 2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.
- 4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
- 5. Students may become susceptible to radicalisation through a range of social, personal and environmental factors it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
- 6. Indicators of vulnerability include:
  - Identity Crisis the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;



- Personal Circumstances migration; local community tensions; and events
  affecting the student's country or region of origin may contribute to a sense of
  grievance that is triggered by personal experience of racism or discrimination
  or aspects of Government policy.
- Unmet Aspirations the student may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration; and
- Special Educational Need students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
- 7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
- 8. More critical risk factors could include:
  - Being in contact with extremist recruiters;
  - Accessing violent extremist websites, especially those with a social networking element;
  - Possessing or accessing violent extremist literature;
  - Using extremist narratives and a global ideology to explain personal disadvantage;
  - Justifying the use of violence to solve societal issues; and
  - Joining or seeking to join extremist organisations; and
  - Significant changes to appearance and/or behaviour;
  - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.



# LEICESTER CITY PRIMARY PRU Whistleblowing Policy

# Reporting illegal or improper conduct

(Disclosures under the Public Interest Disclosures
Act 1998)
or concerns about safeguarding children & young
people



This Whistleblowing Policy is adopted from the Leicester City Council extranet.

#### Introduction

Leicester City Council is committed to conducting its business with honesty and integrity and it expects all staff to maintain high standards of conduct. All organisations, however, face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of the Whistleblowing Policy are:

- To encourage staff to report suspected wrongdoing as soon as is possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy aims to explain what constitutes a whistleblowing complaint, how to raise once, how it will be dealt with and what protection is afforded to a legitimate whistleblower.

# Scope

This Whistleblowing Policy applies to individuals working at all levels within the Primary PRU. The Headteacher, Senior Leadership Team, employees, part-time and fixed-term workers, casual and agency staff (and volunteers) (collectively referred to as **staff** in this policy).

# What is Whistleblowing?

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity,
- miscarriages of justice,
- danger to health and safety,



- damage to the environment,
- failure to comply with any legal obligation or regulatory requirements,
- bribery,
- financial fraud or mismanagement,
- negligence,
- the deliberate concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If you have genuine concerns related to suspected wrongdoing or danger affecting any of the PRU's activities (a **whistleblowing concern**) you should report it under this policy.

# **Whistleblowing is NOT**

This policy should not be used for the following:

- Raising concerns that relate to your own personal circumstances such as the
  way you have been treated at work. Such concerns should be raised in the
  first instance informally with the Headteacher who will attempt to resolve them
  for you. If no resolution is possible, the Grievance procedure, (or other
  appropriate procedure such as the 'Harassment and Discrimination
  procedure') should be used for this purpose.
- Raising concerns of a serious nature which do not fall within the definitions set out above. The Grievance procedure, or other procedure as appropriate, should be used for this purpose.
- Raising concerns as a member of the public. The Corporate complaints procedure should be used for this purpose.
- Raising concerns about Councillors. The Member Code of Conduct and Arrangements should be used for this purpose.

If you are uncertain whether something is within the scope of this policy you should seek advice from Human Resources.

# Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with the Headteacher. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. Where you do not feel you can do this then you should raise your concern with a



member of the Management Committee. In all cases the Headteacher will log the referral with the Chair of the Management Committee so that it can be recorded as a 'whistleblowing complaint'.

Where the matter is more serious, or you feel that the Headteacher has not addressed your concern or you prefer not to raise it with them for any reason, you should raise your concern directly with the Chair of the Management Committee. Should the Chair consider that your concern should not have been raised with them because

- 1. the allegation can be properly dealt with by the Headteacher and/or
- 2. your identity does not need protecting

they will discuss their view with you. Consequently, your referral may be redirected to the Headteacher. In any event it is most likely that the Chair of the Management Committee in dealing with your concern with liaise with the Headteacher regarding its progression. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

# **Confidentiality**

It is hoped that staff will feel able to voice whistleblowing concerns openly under this policy. If, however, you want to raise your concern confidentially, every effort will be made to keep your identity confidential. In these circumstances and if it is necessary for anyone investigating or involved generally in your concern to know your identity, this will be discussed with you prior to your identity being disclosed.

Anonymous disclosures are not encouraged. Proper investigation may be more difficult or impossible if further information cannot be obtained from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should raise this at the time that they make their disclosure and appropriate measures can then be taken. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.



#### **External Disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern externally. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a contractor. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. You are encouraged, however, to report such concerns internally in line with the procedure outlined above.

# **Investigation and Outcome**

Once you have raised a concern, an initial assessment will be undertaken to determining what, if any, steps should be taken. As part of this process, whether your concern falls within the scope of this policy will be considered. You will be informed of the outcome of the assessment. You may be required to attend meetings in order to provide further information.

Following the initial assessment an investigation may be undertaken. It may be appropriate for the Headteacher or someone else to undertake the investigation. Questions of potential conflict of interest will be considered in determining the appropriateness or otherwise of any particular person carrying out an investigation. Where a potential or actual conflict of interests exists for a particular person they should not carry out the investigation. In exceptional circumstances or where specific expertise is required, an external investigator may be appointed.

It may be appropriate to instigate a further procedure following the conclusion of any investigation, such as the disciplinary procedure. Such action falls outside the scope of this policy.



Whilst in most circumstances you will be kept informed of the progress of any investigation and its likely timescale, the need for confidentiality may prevent the provision of information to you, including specific details of the investigation or any disciplinary action taken as a result. The investigator will decide what details, if any, should be provided to you regarding the investigation itself and its outcome. You should, however, treat any information about the investigation provided to you as confidential.

If it is concluded that a whistleblower has made false allegations maliciously, in bad faith (ie not merely mistaken) or with a view to personal gain, the disciplinary procedure will be followed in respect of that complaint.

# **Protection and Support for Whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. The Primary PRU and Leicester City Council aims to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Headteacher or HR immediately who will assess what steps, if any, should be taken. If for any reason you do not believe it is appropriate to raise this with your Headteacher you should inform the Management Committee. If the matter is not resolved to your satisfaction you may raise this using the Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

# Responsibility for the success of this policy

The Management Committee has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Management Committee has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.



The Management Committee should review this policy from a legal and operational perspective at least once a year. Trade unions will be consulted before any changes are made.

**Public Concern at Work** 

(Independent whistleblowing charity)

**Helpline**: (020)7404 6609

email: whistle@pcaw.co.uk

Website: www.pcaw.co.uk