



Safeguarding and Child Protection Policy

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Links to other policies:	Positive Behaviour Policy, Health & Safety, PSHE/ RSE and Anti-Bullying Policy	

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Important contacts

Name	Role	Contact
Austin Bowers 	Headteacher: DSP	Austin.Bowers@youngfoundations.com 07966491259
Darren Gilmour 	Senior Teacher: DDSP	Darren.Gilmour@youngfoundations.com 07443994646

Lynette Edwards	Young Foundations Chair of the Education Business Board	Lynette.edwards@youngfoundations.com 07570266942
Niall Kelly	CEO	Niall.kelly@youngfoundations.com 07772 391 363

1. Aims

Oaklea Grange School aims to ensure that:

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

2. Legislation and statutory guidance

Welsh Government Polices

This policy is a statement of the aims, principles and strategies relating to safeguarding children. Our policy applies to all staff, directors and volunteers working at Oaklea Grange School.

ALL STAFF MUST READ The Welsh Government Legislation "Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002" (March 2022)

[Keeping Learners Safe \(gov.wales\)](https://gov.wales)

This policy has been developed in accordance with the principles established by the All Wales Pupil Protection Procedures (2008); The Independent School Standards (Wales) 2024 Regulations; Keeping Learners Safe 283/2022; Safeguarding Children in Education: the Role of Local Authorities and Governing bodies under the Education Act 2002; Welsh Government Circular 009/2014 – Safeguarding Children in Education: Handling Allegations of Abuse against Teachers and Other Member of Staff; the All Wales protocol safeguarding and promoting the welfare of children who are at risk of abuse through sexual exploitation.

The safety and welfare of children who are pupils at the school is paramount.

This policy should be read in conjunction with:

- [Supplementary guidance for Safeguarding from September 2024](#)
- 283/2022 – "Keeping Learners Safe: The Role of local authorities and governing bodies under the Education Act 2002"
- Welsh Government Circular 009/2014 – Safeguarding Children in Education: Handling
- Allegations of abuse against teachers and other members of staff and the prevention of unsuitable people from working with children and young persons which has regard to National Assembly for Wales (NAfW) circular 34/02
- "Pupil Protection: Preventing Unsuitable People from Working with Children and Young Persons in the Education Service"
- NAfW circular 02/03 "Criminal Records Bureau: Basic Facts for School Volunteers
- Reporting Misconduct and Incompetence in the Education Service (168/2015)
- The All-Wales protocol safeguarding and promoting the welfare of children who are at risk of abuse through sexual exploitation

- Social Services and Well-being (Wales) Act 2014
- Working Together to Safeguard Children (2018)
- What to do if you're worried a pupil is being abused (2015)
- Welsh Government; working together to safeguard people- Information sharing to safeguard children and adults
- Responding to Incidents of Sexting (UKCCIS) (2016)

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

Neglect is a form of abuse and is the persistent failure to meet a pupil's basic physical and/or psychological needs, likely to result in the serious impairment of the pupil's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

Contextual Safeguarding

Contextual Safeguarding in Wales Framework

The Contextual Safeguarding Approach is linked into the Wales Legislative Framework to help safeguarding pupil at risk of extra familial harm.

Contextual Safeguarding is an approach to understanding, and responding to, pupil's experiences of significant harm beyond their families. It recognises that the different relationships that pupil form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and pupil's experiences of extra-familial abuse can undermine parent-pupil relationships.

Therefore, children's social care practitioners, pupil protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of pupil protection systems in recognition that pupils are vulnerable to abuse beyond their front doors.

Oaklea Grange School recognises that it is everybody's responsibility to share information and make reports and it is everybody's responsibility to create safe spaces for, and safety around pupils. Oaklea Grange School understands it's responsibility to work in partnership with professionals central to the safety and welfare of the pupil and sets out in this policy how it responds to safeguarding issues within school as a component to extra familial-context central to the pupil.

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have additional learning needs (ALN) (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)

5. Roles and responsibilities

Safeguarding and pupil protection is **everyone's** responsibility. This policy applies to all staff, volunteers and the school advisory board and is consistent with the procedures of Social Care Wales. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read 'Keeping Learners safe: a summary version' of the Welsh Government's statutory safeguarding in education statutory guidance, *Keeping Learners Safe- The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002* and review this guidance at least annually.

All staff will complete the Hwb Education Wales safeguarding modules. (These cannot be certified)

All staff will complete the Educare Safeguarding and Duty of Care Course.

All staff will be aware of:

- Our systems which support safeguarding, including this pupil protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding person/people (DSP), the behaviour policy and the safeguarding response to children who go missing from education.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSP, and sharing information with other professionals to support early identification and assessment
- The process for making reports to local authority children's social care and for statutory assessments that may follow a report, including the role they might be expected to play

- What to do if they identify a safeguarding issue or a pupil tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as pupil sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding person (DSP)

The DSP is a member of the senior leadership team. Our DSP is Natasha Moore. The DSP takes lead responsibility for pupil protection and wider safeguarding.

During term time, the DSP will be available during school hours for staff to discuss any safeguarding concerns.

Natasha Moore: Designated Safeguarding Person Oaklea Grange School – 07966491259

When the DSP is absent, Darren Gilmour the Deputy Head of Education (DDSP) will cover:-
07443994646

If the DSP and DDSP are not available, Lynette Edwards– Young Foundations Chair of the Education Business Board will act as cover (for example, during out-of-hours/out-of-term activities) on 07570266492

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

- ☐ Provide advice and support to other staff on pupil welfare and pupil protection matters
- ☐ Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- ☐ Contribute to the assessment of children
- ☐ Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such reports directly
- ☐ Liaise with local authority case managers and designated officers for pupil protection concerns as appropriate.

The full responsibilities of the DSP and Deputy are set out in their job description.

5.3 The Proprietor

The proprietor or director of education will approve this policy at each review, ensure it complies with the law and hold the head of education to account for its implementation.

The proprietor will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full advisory board. This is always a different person from the DSP.

In this case, Lynette Edwards will monitor the effectiveness of the policy.

The proprietor will act as the 'case manager' in the event that an allegation of abuse is made against the head of education, where appropriate (see appendix 3).

The proprietor and/or Director of Education will read *Keeping Learning Safe in Education and attend safeguarding training*.- logged on the single central record.

Section 15 of this policy has information on how the governing body are supported to fulfil their role.

5.4 The Head of Education

The head of education is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents/caregivers when their pupil joins the school and via the school prospectus
- Ensuring that the DSP has appropriate time, funding, training and resources, and that there is always adequate cover if the DSP is absent and that all staff know who to contact in their absence
- Ensuring that all staff undertake appropriate safeguarding and pupil protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

Confidentiality and Information sharing

Sharing information is an intrinsic part of any practitioner's role. The decisions about how much information to share, with whom and when can have a profound impact on people's lives. Staff identify that early sharing of information is key to providing effective early help where there are emerging problems. Furthermore, staff make decisions based on whether the sharing of information is likely to safeguard and protect the pupil. Whilst respecting the duty of responsibility regarding confidentiality, staff understand this may be breached where this is in the best interests of the pupil and/or public safety. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet.

<https://gov.wales/sites/default/files/publications/2019-09/information-sharing-to-safeguard-children-and-adults.pdf>

Our effective safeguarding arrangements are underpinned by two key principles:

1. **Safeguarding is everyone's responsibility:** for services to be effective each practitioner and agency must play their full part both individually and in collaboration.
2. **A pupil-centred approach:** for services to be effective they should be based on a clear understanding of the personal outcomes for the pupil and what matters to them. The rights of the pupil should be central to the approach and their best interests should always be paramount.

There are several principles that can assist practitioners in making decisions about sharing information:

1. Necessary and proportionate - When taking decisions about what information to share, staff should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and staff should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk
2. Relevant - Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions
3. Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon
4. Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained
5. Timely - Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a pupil. Timeliness is key in emergency situations, and it may not be

appropriate to seek consent for information sharing if it could cause delays and therefore place a pupil or young person at increased risk of harm. Practitioners ensure that sufficient information is shared, as well as consider the urgency with which to share it

6. Secure - Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information

7. Record - Information sharing decisions should be recorded, whether the decision is taken to share, and shared with the DSP as soon as possible. The information should not be kept any longer than is necessary

Taken from: Social Services and Well-being (Wales) Act 2014 - Working Together to Safeguard People
Information sharing to safeguard children Non-statutory guide for practitioners [38137 Working together to safeguard people: Non-statutory guide on information sharing to safeguard children \(gov.wales\)](#)

Oaklea Grange School accepts its responsibilities that The GDPR and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping pupils safe. We consider what is necessary, proportionate, relevant, and adequate and, that accurate and timely information is provided and communicated securely.

We will:

- REMEMBER THAT THE GENERAL DATA PROTECTION REGULATION (GDPR), DATA PROTECTION ACT 2018 and Human Rights Act (1998) are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately
- BE OPEN AND HONEST with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so
- SEEK ADVICE from other practitioners, or the Director of Education, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible
- WHERE POSSIBLE, SHARE INFORMATION WITH CONSENT, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared
- CONSIDER SAFETY AND WELL-BEING: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

- Staff and Governors must follow the procedures set out below in the event of a safeguarding issue.
- Please note – in this and subsequent sections, you should take any references to the DSP to mean “the DSP (or deputy DSP)”.

7.1 If a pupil is suffering or likely to suffer harm, or in immediate danger

Tell the DSP (see section 5.2) immediately.

The DSP will make a report to The Flintshire Duty Social Worker , Children's Services on **01352 701000** if you believe a pupil is suffering or likely to suffer from harm, or in immediate danger. However, if

necessary, in these circumstances, anyone can make a report. You can also make a report direct to the police if the concerns are very serious.

If you need to report concerns out of office hours, then please contact the **Emergency Duty Team** on 0345 0533116

If you are a professional reporting concerns then you will need to follow this up in writing using the Multi- agency Report Form (MARF) and send this to Pupilprotectionreferral@flintshire.gov.uk within 24 hours of contacting Flintshire Duty Officers.

If there is any difficulty with making telephone contact, you can also use the GOV.Wales webpage for reporting pupil abuse to your local council: [Reporting suspected abuse, harm or neglect \(safeguarding\) | GOV.WALES](#)

The contact number for the lead officer for pupil protection in Wrexham is 01978 298733 and for Flintshire is 01352 701000.

7.2 If a pupil makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show if you are shocked or upset
- Tell the pupil they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the pupil's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and immediately pass it on to the DSP. Alternatively, if appropriate, make a report to children's social care and/or the police directly (see 7.1), and tell the DSP as soon as possible that you have done so.

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

Section 5B of the Female Genital Mutilation Act 2003 introduces a mandatory reporting duty that requires teachers in England and Wales to report to the police known cases of FGM in under-18s that they identify in the course of their professional work.

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSP and follow our local safeguarding procedures.

For further information and guidance please follow 'Keeping Safe in Education' link below: <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

7.4 If you have concerns about a pupil (as opposed to believing a pupil is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 illustrates the procedure to follow if you have any concerns about a pupil's welfare.

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

If in exceptional circumstances the DSP/DDSP is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team (Lynette Edwards) and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSP as soon as practically possible.

Make a report to local authority children's social care directly, if appropriate (see 'Report' below). Share any action taken with the DSP as soon as possible.

Early help

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

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

Flintshire's early help hub are available online [Social Services \(flintshire.gov.uk\)](https://www.flintshire.gov.uk/social-services) or by telephone on **01352 701000**

Report

If it is appropriate to refer the case to local authority children's social care or the police, the DSP will make the report or support you to do so.

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

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

If the pupil's situation does not seem to be improving after the report, the DSP or person who made the report must follow local escalation procedures to ensure their concerns have been addressed and that the pupil's situation improves.

Local arrangements for escalating concerns, should be emailed to Peter.robson@flintshire.gov.uk regarding an allegation against an adult or jenny.frost@flintshire.gov.uk for children's services.

7.5 If you have concerns about extremism

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

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

Where there is a concern, the DSP will consider the level of risk and decide whether to make a report using the ; [All Wales Prevent Partners Referral Form - English \(south-wales.police.uk\)](https://www.south-wales.police.uk/all-wales-prevent-partners-referral-form-english)

Suspected online terrorism content, including articles, images, speeches or videos that promote terrorism or encourage violence, or encourage people to commit acts of terrorism, websites made by terrorist or extremist organisations and videos of terrorist attacks can be reported here;

[Do you have a link to the material? – GOV.UK \(report-terrorist-material.homeoffice.gov.uk\)](https://www.gov.uk/report-terrorist-material)

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

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

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If you have a mental health concern about a pupil that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

All staff will be trained to support mental health and emotional wellbeing within a school setting.

All staff will be trained in, mental health first aid, self-harm, suicide, mental wellbeing in young people and CAMH's pilot mental health scheme.

Staff are not mental health experts and are not trained, qualified or expected to diagnose conditions.

However, we take seriously our role in spotting the signs and symptoms of mental health decline and we follow the steps in section 7.4 to escalate concerns where necessary.

At Oaklea Grange School we will prepare ourselves through training, knowledge and development to intervene early when a pupil is showing signs of mental distress. This will be done through the provision of a safe, calm and therapeutic environment to provide safety and containment for the pupil before symptoms progress and mental health declines.

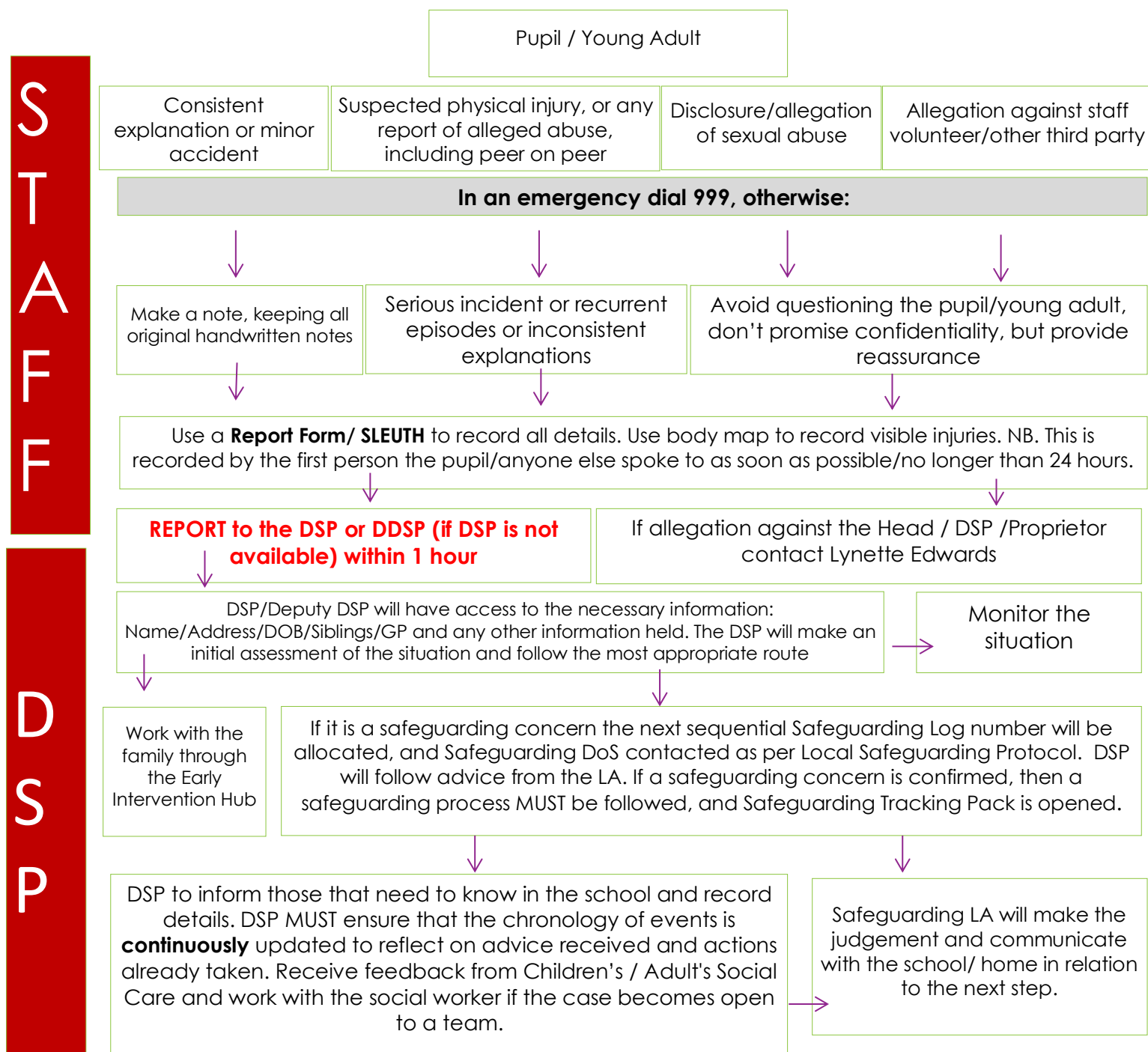


Figure 1: procedure if you have concerns about a pupil's welfare (as opposed to believing a pupil is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSP is unavailable, this should not delay action. See section 7.4 for what to do.)

Pupil Protection and safeguarding procedure (Flow chart)

DSP – Designated Safeguarding Person

CSC– Children's Social Care

LADO – Local Authority Designated Officer

7.7 Concerns about a staff member, supply teacher or volunteer

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

The Head of Education/Director of Education will then follow the procedures set out in appendix 3, if appropriate.

7.8 Allegations of abuse made against other pupils

Safeguarding issues can manifest themselves via peer-on-peer abuse which can include (but is not limited to) bullying (including cyberbullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, gender-based violence/sexual assaults, sexting, sexual violence and sexual harassment, and initiation / hazing type violence and rituals.

1. Up skirting typically involves taking a picture under a person's clothing without them knowing and with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause humiliation, distress or harm.
2. Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The school recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the school recognises the gendered nature such behaviour can take. See Appendix 1 for more information about harmful sexual behaviour
3. Peer-on-Peer abuse is never acceptable and will always be taken seriously and acted upon in accordance with this policy. Peer on Peer abuse will not be dismissed as 'banter', 'having a laugh' or 'part of growing up'.
4. The school takes steps to minimise the risk of all types of Peer-on-Peer abuse. The school has robust anti-bullying procedures in place (see the school's preventing bullying policy) and pupils are taught at all stages of school about acceptable behaviour and how to keep themselves safe.
5. A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a pupil is suffering, or is likely to suffer, significant harm.
6. Risk assessments are carried out and kept under review.
7. Appropriate action is taken to protect pupils identified as being at risk and those with vulnerabilities of those with special educational needs and disabilities.
8. To safeguard children within their community, the school seeks to engender an atmosphere where children can discuss their concerns with any of the adults around them.
9. The school recognises that situations where one pupil may be endangering another are very sensitive and the needs of all the pupils involved will be taken very seriously under the guidance of the DoS and Children's Social Care.

Procedures

1. Allegations against pupils should be reported in accordance with the procedures set out in this policy. If harmful sexual behaviour is alleged to have occurred, the DSP will have regard to [Social care Wales \(safeguarding.wales\)](https://www.wales.nhs.uk/sites/default/files/2020/07/Social_care_Wales_safeguarding.wales) and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.
2. Where abuse may be Peer on Peer, a pupil against whom an allegation of abuse has been made may be suspended from the school as a neutral measure during the investigation and the school's policies on behaviour, discipline and sanctions will apply.

3. The school will take advice from Flintshire Safeguarding DOS and / or the police, as appropriate, on when and how to inform the pupil and their parents/caregivers about the allegations and how the investigation of such allegations will be conducted.
4. The school will carry out risk assessments and will take all appropriate action to ensure the safety and welfare and continued education of all pupils including the alleged victim and perpetrator.
5. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of relevant agencies, the pupil's carers/parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.
6. Confidentiality will be an important consideration for the school and advice will be sought as necessary from Flintshire Safeguarding Team-DOS and the Police as appropriate.

The Welsh Government has funded the NSPCC and Barnardo's to produce guidance on harmful sexual behaviour, sexual exploitation and Peer-on-peer abuse for schools, which will be available on Hwb. Staff should also refer to the All Wales Practice Guide for further advice and guidance.

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

- You must record the allegation and tell the DSP, but do not investigate it
- The DSP will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSP will put a risk assessment and support plan into place for all children involved (including the victim(s), the pupil(s) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSP will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.
- The DSP will use the site's linked clinician at the time (if possible and appropriate)

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to male pupils
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff about any concerns by adding this to their school induction process
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the pupil is being abused themselves, and that this would fall under the scope of this policy

All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

Those who have been bullied will be supported by their key teacher, through regular 1:1 meetings and will be given the option of meeting with a clinician used by Young Foundations and assigned to Oaklea Grange School. Following any disciplinary action, perpetrators will be supported through 1:1

meetings with a member of the SLT to explore the reasons for their behaviour. Where relevant, interventions will be put in place and reviewed regularly. Peer Mediation and Restorative Justice resolution will be considered as an option in all cases.

Informing parents/carers

1. Parents/carers will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Senior or Deputy Designated Safeguarding Person will need to consult the Head of Education, children's social care, the police and / or the pupil before discussing details with parents/carers.
2. In all cases the DSP will be guided by the Flintshire Safeguarding Team report threshold document.

Additional reporting

In addition to the reporting requirements explained above, the school will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to the following:

- If it is serious, and potentially a criminal offence
- If it could put pupils in the school at risk

The school is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy.

7.9 Sexting

In August 2016 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of sexting by under-18s. Over 200 organisations were involved in creating the guidance, including the internet industry, children's charities, UK Safer Internet Centre, National Crime Agency (including Child Exploitation and Online Protection Centre (CEOP)), Police, and teachers' groups.

Your responsibilities when responding to an incident

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

You must:

- NOT view, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSP
- NOT delete the imagery or ask the pupil to delete it
- NOT ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSP's responsibility)
- NOT share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- NOT say or do anything to blame or shame any pupil involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSP.

Initial review meeting

Following a report of an incident, the DSP will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a report needs to be made to the police and/or children's social care
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved

The DSP will make an immediate report to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs/Additional learning need)
- What the DSP knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSP has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSP, in consultation with the and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSP

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

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

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

Informing parents/caregivers

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

Referring to the police

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

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage (age and stage appropriate)

Pupils are taught about the issues surrounding sexting as part of our PSHE/RSE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.
- That the image is then very difficult to remove if it has been shared on online platforms (digital footprint)

8. Notifying parents, caregivers and/or social workers

Where appropriate, we will discuss any concerns about a pupil with the pupil's parents/ care givers. The DSP will normally do this in the event of a suspicion or disclosure.

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

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

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

9. Pupils with additional learning needs and disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with ALN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant pupil such as the shin, might be of concern on a non-mobile pupil
- 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 pupil's means of communication
- Ill-fitting equipment. for example, callipers, sleep boards, inappropriate splinting
- Misappropriation of a pupil's finances
- Inappropriate invasive procedures

Pupils with neuro-disabilities have the same right to protection as all pupils, and professionals have a duty to understand and respond to their needs, including those related to pupil protection. Some indicators of abuse can also be traits of autism, such as avoiding eye-contact and being withdrawn. This makes it more difficult to identify abuse and a careful exploration is required. It is important to identify any changes in a pupil's behaviour and to explore what may lie behind this. The change in behaviour may be communicating an unmet need but it could, in some circumstances, indicate a child protection concern.

As a specialist provision, we offer extensive support for pupils with ALN and disabilities.

10. Pupils with a social worker

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

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

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

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

11. Children who are Looked-after and previously Children who were looked-after

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSP has details of children's social workers and relevant Virtual School Heads
- All teachers and tutors are appropriately trained, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of teaching their role, they will:

- Work closely with the DSP to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

12. Mobile phones and cameras

Appropriate use of mobile phones is essential at Oaklea Grange School. Personal mobiles should never be used around pupils. There are walkie talkies on site as well as school mobiles to be used in case of emergency.

During working hours, phones must be kept out of the reach of pupils in a secure area accessible only to staff. (staffroom - locked drawer/area) All staff are made aware of their duty to follow this procedure which is set out in the Staff Handbook and Staff Code of Conduct Policy.

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

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

Visitors to the setting are not permitted to use mobile phones around the school site.

Pupils are not permitted to have mobile phones/devices in school.

We believe that photographs and videos validate and celebrate children and pupil's experiences and achievements. Parental/caregiver permission for the different ways in which we use photographs / videos is gained as part of the initial admissions process.

Pupils are encouraged to use school allocated cameras and devices to capture progress and curriculum activities. To safeguard children and adults and to maintain privacy, cameras and phones are not to be taken into the toilets by staff or pupils. All staff understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act.

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

Permission for taking photos will be agreed at the start of a pupil's admission to the school and if this is not agreed, staff will be made aware. Staff should also be sensitive to pupils who decide they do not wish to have their photo taken at a particular time and to respect this wish. Staff should also be mindful of pupil's wishes when putting any photos on display.

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3)

13.2 Other complaints

Anyone wishing to make any other complaint should follow the school's complaints policy which provides full details.

13.3 Whistle-blowing

Oaklea Grange School has a clear whistleblowing policy which guides school colleagues to raise concerns with their manager in the first instance.

14. Record-keeping

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

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

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

Safeguarding records relating to individual pupils will be retained for a reasonable period of time after they have left the school.

If a pupil for whom the school has, or has had, safeguarding concerns moves to another school, the DSP will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSP will speak to the DSP of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the pupil and of other pupils, if necessary

Child protection records are kept on the school's protected management system. All staff can access new forms but cannot see records completed by others.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

In line with the national safeguarding training, learning and development standards reference: [National safeguarding training, learning and... | Social Care Wales](#) Oaklea Grange School trains staff to various different levels.

1. Oaklea Grange School recognises that all staff need to have appropriate pupil protection training that equips them to recognise and respond to welfare concerns of children and pupils.
2. All staff are given mandatory induction, which includes familiarisation with Safeguarding and Child Protection Policy, Staff Conduct Policy, the Designated People in the school their responsibilities and procedures to be followed. Keeping Learners Safe in Education, GDPR Policy, use of personal phones.
3. All staff should read and be provided with any additional support or information needed to be able to understand, at the very least Keeping Learners Safe- a summary version.
4. Training, is undertaken by staff on an annual basis to ensure their knowledge and skills

are up to date, this training takes into account the HwB modules, **Introduction to safeguarding - Keeping learners safe module 1, Safeguarding roles and responsibilities - Keeping learners safe module 2 and Safeguarding practice case studies - Keeping learners safe module 3** and Educare-Safeguarding Young People

5. All staff members receive appropriate safeguarding and Child protection training which is regularly updated through Flintshire Social Services Workforce Development Team-*safeguarding for professionals*. In addition, all staff members receive ongoing safeguarding and Child protection updates using North Wales Safeguarding Board 7-minute briefings, utilising email, e-bulletins and staff meetings, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

6. A report of the school's training needs assessment is to be presented to governors annually so that they can ensure that training is appropriately provided for all staff.

7. A training matrix is kept - indicating when staff have been trained and this in turn informs the annual report

8. Safer recruitment training is undertaken by all members of the Senior Team who may be involved in staff recruitment, including:

- Recruitment/HR Administrator
- Head of Education and Assistant Head of Education
- Teachers and Tutors
- Governance

All staff will have training on the government's anti-radicalisation strategy, *Prevent*, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Contractors will receive safeguarding training, where applicable.

Volunteers will receive appropriate training, if applicable.

All visitors/volunteers/ contractors will read our leaflet on safeguarding before they enter the school.

Pupils at the school will be informed upon arrival who the safeguarding leads are, where to report using their pupil friendly form and who to give this too if needed. Pupils are aware of the 'letterbox' system in school to support them to hand over information if required. Pupils are then asked randomly at points in the year as to who their DSP's are and how to keep themselves safe. Oaklea Grange also promotes safeguarding in school for pupils by a annual safeguarding week and through appropriate targeted assebmilies.

15.2 The DSP and DDSP

The DSP and DDSP will undertake Child protection and safeguarding training at least every 3 years. Group C training.

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

They will also undertake Prevent awareness training.

15.3 Proprietors

All proprietors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

The proprietor or Director of Education may be required to act as the 'case manager' if an allegation of abuse is made against the Head of Education, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, Keeping Learners Safe and will be in line with local safeguarding procedures.

15.5 Staff who have contact with pupils and families

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

16. Monitoring arrangements

This policy will be reviewed **annually** by the Head of Education. At every review, it will be approved by the SAB.

17. Links with other policies

This policy links to the following policies and procedures:

- Positive Behaviour Policy
- Staff code of conduct
- Complaints Policy
- Health and Safety Policy
- Attendance Policy
- Admissions Policy
- GDPR Policy
- Disability and Accessibility Policy
- Equality and Diversity Policy
- ALN Policy
- Relationships and Sex Education
- First Aid Policy
- Curriculum Policy
- Whistleblowing Policy
- Anti-Bullying Policy

The following appendices are based on the Social Services and Well-being (Wales) Act 2014- Part 7, Keeping Learners Safe and the All Wales Safeguarding procedures

Appendix 1: types of abuse

Children should be recorded as being at risk of abuse, neglect or harm under one, or more, of the following categories according to a decision by the child protection conference

- Physical;
- Emotional or Psychological;
- Sexual;
- Financial;
- Neglect.

The following is a non-exhaustive list of examples for each of the categories of abuse and neglect:

- Physical abuse - hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions;
- Emotional/psychological abuse - threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks, witnessing abuse of others
- Sexual abuse - forcing or enticing a pupil or young person to take part in sexual activities, whether or not the pupil is aware of what is happening, including: physical contact, including penetrative or non-penetrative acts; non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways;
- Financial abuse - this category will be less prevalent for a pupil but indicators could be: - not meeting their needs for care and support which are provided through direct payments; or - complaints that personal property is missing
- Neglect - failure to meet basic physical, emotional or psychological needs which is likely to result in impairment of health or development.

Definitions

Harmful sexual behaviours' (HSB) can be defined as: sexual behaviours expressed by children and young people under the age of 18 years that are developmentally inappropriate, may be harmful towards themselves or others, or be abusive towards another child, young person or adult. This definition of HSB includes both contact and non-contact behaviours (grooming, exhibitionism, voyeurism and sexting or recording images of sexual acts via smart phones or social media applications).

This practice guide is not intended for use in cases of mutually consenting, non exploitative sexual activity between children aged 13-16 years old. Children under the age of 13 years are unable to legally give consent to sexual activity. Therefore, any alleged sexual activity concerning a child under 13 years and another child must be considered in line with the Wales Safeguarding Procedures and with reference to this practice guide.

An allegation of non consensual sexual activity concerning children, even where they are of a similar age, must be properly investigated in line with the Wales Safeguarding Procedures, whatever the age of the children involved.

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

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

New staff

When appointing new staff, we will:

1. Verify their identity
2. Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
3. Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
4. Verify their medical fitness to carry out their work responsibilities
5. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
6. Verify their professional qualifications, as appropriate
7. Ensure they are not subject to a prohibition order if they are employed to be a teacher
8. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
9. Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.
10. We will ask for written information about previous employment history and check that information is not contradictory or incomplete.
11. We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

We will refer to the DBS / EWC anyone who has harmed, or poses a risk of harm, to a pupil or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a pupil or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out using the Educational Workforce Council Register.

Volunteers

We will:

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

Proprietors/Governance

The proprietor will have their DBS check countersigned by the secretary of state.

All proprietors and governing members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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

Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a pupil, or may have harmed a pupil, or
- Possibly committed a criminal offence against or related to a pupil, or
- Behaved towards a pupil or children in a way that indicates he or she may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

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

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

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

Suspension of the accused until the case is resolved

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

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

Redeployment within the school so that the individual does not have direct contact with the pupil or children concerned

Providing an assistant to be present when the individual has contact with pupils

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to pupils

Moving the pupils classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Temporarily redeploying the individual to another role in a different location, for example to an alternative school or site.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the (or chair of governors/proprietor) where the is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the pupil/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the pupil/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a report to the DBS/EWC where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a pupil, or if the individual otherwise poses a risk of harm to a pupil

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the proprietor will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a report to the DBS/EWC for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a pupil, or if they think the person otherwise poses a risk of harm to a pupil, they must make a report to the DBS/EWC

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

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

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

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

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

Appendix 4: specific safeguarding issues

We offer an innovative and flexible provision offer, and our explicit knowledge, pertains to the difficulties that children experience, through exposure to early childhood adversity, family separation and removal, patterns of disrupted attachment, developmental trauma and unmet pupil development and learning needs, underpins all aspects of school life, teaching and learning.

Our approach is healing-centred and relationship-based, which aims to build long lasting and trusting relationships.

Training is therapeutic and focusses on the pupil holistically, whilst being aware of the impact that adversity and trauma can have on the developing brain and the neurobiology of pupil development.

Children missing from education

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

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

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

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

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

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

Child criminal exploitation (CCE)

Pupil criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a pupil into criminal activity, in

exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

The victim can be exploited even when the activity appears to be consensual, especially where the pupil has received something in exchange such as money, drugs, alcohol, clothes or technology.

It is important that adults recognise this as part of the grooming process and that these children are victims themselves, not criminals.

It does not always involve physical contact and can happen online. For example, pupil may be forced to work in cannabis factories, coerced into moving drugs or money across the country with specific mobile phone lines available (County Lines) and dedicated to this criminal activity. They may also be forced to shoplift or pickpocket, threaten other pupil and vulnerable adults.

Indicators of CCE can include a pupil:

- Poor school attendance
- A decline in academic performance
- A change in friendship groups or new relationships, particularly new relationships with older individual or groups.
- Unexplained gifts or new possessions
- Changes in behaviour, a decline in physical and emotional wellbeing
- Signs of assault or unexplained injury
- Misusing drugs and alcohol
- Returning home late, staying out all night, going missing or not returning home
- Regularly missing school or education
- Drug related language

Staff should remember that although all children under 18 can be the target for grooming and exploitation there are specific vulnerable groups of children where this occurs more frequently;

- Children who are looked after
- Children who are homeless
- Pupils with SEND and additional/complex needs
- Children experiencing family disruption; parental separation, alienation and/or divorce
- Children excluded from school
- Children with diagnosed and undiagnosed mental health and emotional well-being struggles
- Children without safe, secure and emotionally attuned relationships and/or key adult role models to support, guide and nurture
- Children who have experienced separation, grief and loss
- Not taking part in education

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

Further information and training resources [The Children's Society](#) [NSPCC](#)

Child sexual exploitation (CSE)

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

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

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

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

Indicators of CSE can include:

- Poor school attendance
- A decline in academic performance
- A change in friendship groups or new relationships, particularly new relationships with older individual or groups.
- Unexplained gifts or new possessions
- Changes in behaviour, a decline in physical and emotional wellbeing
- Signs of assault, unexplained injury and physical harm, such as bruising, cigarette burns, branding
- Using drugs and alcohol
- Returning home late, staying out all night, going missing or not returning home
- Regularly missing school or education
- Experiencing health problems that may indicate a sexually transmitted health infection
- Displays of inappropriate sexualised behaviour, such as overfamiliarity with strangers/others, dressing in a sexualised manner, sending sexualised images via an electronic device (sexting)

Staff should remember that although all children under 18 can be the target for grooming and exploitation there are specific vulnerable groups of children where this occurs more frequently;

- Looked After Children
- Children who are homeless
- Pupils with SEND and additional/complex needs

- Children experiencing family disruption; parental separation, alienation and/or divorce
- Children excluded from school
- Children with diagnosed and undiagnosed mental health and emotional well-being struggles
- Children without safe, secure and emotionally attuned relationships and key adult role models to support, guide and nurture
- Children who have experienced separation, grief and loss

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

Further information and training resources [The Children's Society](#) [NSPCC](#)

VAWDASV

VAWDASV stands for Violence Against Women, Domestic Abuse and Sexual Violence.

It incorporates Violence Against Women (and Girls), Domestic Abuse, Rape and Sexual Violence, Sexual Harassment, Female Genital Mutilation, Honour based violence, Forced Marriage, Stalking, Trafficking and other forms of violence.

[VAWDASV National Strategy Consultation Document \(gov.wales\)](#)

confirms that-

Violence against women and girls is violence against someone because they are a woman or a girl. It could be verbal threats, physical and/or sexual assault or rape. It can happen in their home, where they work or in the community.

Domestic abuse is when someone abuses another person that they have had a relationship with (or in the relationship) are related or closely connected to, and both people are 16 or over. It is also domestic abuse where a pupil sees, hears or experiences the effects of abuse towards a parent or relative.

Sexual violence is any sexual act that is not wanted. It can include rude phone calls, being touched in a sexual way and rape. Men and women can be victims of sexual violence.

In order for us to support the Welsh Governments drive to increase awareness and prevent VAWDASV

All staff at Oaklea Grange School are trained at Group 1-

When available the Headteacher will be trained at group 3 level.

This is for all professionals working in the public service. The training will provide:

- basic awareness of what violence against women, domestic abuse and sexual violence is

- how to recognise domestic abuse and sexual violence help available to victims.

Oaklea Grange School follows and implements advice from - [secondary-schools-educational-resources.pdf \(gov.wales\)](#)

There are many opportunities within the secondary school curriculum to develop pupil's understanding and skills to prevent violence against women, domestic abuse and sexual violence.

The following are the key themes to integrate into current work:

- Changing gender norms, roles and expectations.
- Building respectful relationships.
- Identifying and understanding violence against women, domestic abuse and sexual violence.
- Challenging and stopping violence against women, domestic abuse and sexual violence.
- Help-seeking and support.

Oaklea Grange School will-

- Make a strategic decision to integrate work on violence against women, domestic abuse and sexual violence and gender equality into the curriculum, ensuring governor and head teacher support.
- Organise staff training to raise awareness, assess aims and implementation, and develop a clear action plan.
- Implement the work with 'whole school' structures, activities – assemblies, use of World Days (e.g. International Day for the Elimination of Violence against Women, 25 November, International Women's Day, 8th March) – ad tutorial programmes.
- Ensure that school staff members are aware and informed of procedures for school incidents or disclosures, and that clear and active links are established with relevant external agencies. The DSP will seek advice from Flintshire Safeguarding Team and/or police if a incident or disclosure is made.
- Seek help and guidance from local professionals within the Local Authority or voluntary sector, including within safeguarding and pupil protection, domestic abuse and sexual violence and youth services. Advice website and line - [Live Fear Free helpline | GOV.WALES](#) contact number- 0808 801080
- Create a safe environment for pupils to speak out or/and use a 'Safe to speak' box in classrooms.

For further information refer to- [Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026 \[HTML\] | GOV.WALES](#)

Pupils Document- [VAWDASV Consultation for young persons \(gov.wales\)](#)

Trafficking

According to The United Nations Convention against Transnational Organised Crime (the *Palermo Protocol*) describes trafficking as 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of use of force or other forms of coercions, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation'.

At a minimum, exploitation includes harm and sexual and criminal exploitation of others, forced labour or services, slavery or practices similar to slavery, servitude of the removal of organs.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Information for school and residential children's homes can be found on the NSPCC website.

The All Wales Practice Guides provide more information called 'Safeguarding children who may be trafficked' which link can be found on page 39 of 'Keeping Learners Safe'.

Homelessness

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

The DSP and Deputy will be aware of contact details and report routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a pupil has been harmed or is at risk of harm, the DSP will also make a report to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (pupil health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

The All Wales Practice Guides provide more information called 'Safeguarding children from harmful practices, related to tradition, culture, religion or superstition' which link can be found on page 39 of 'Keeping Learners Safe'.

Forced marriage

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

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

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

The DSP will:

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

Preventing radicalisation

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

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

☐ **Terrorism** is an action that:

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

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

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, pupil 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 pupil 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.

Oaklea Grange School values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both pupil and staff 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.

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 pupil vulnerable to future manipulation and exploitation.

Oaklea Grange School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children and pupil from the risk of radicalisation is part of our safeguarding duty. We recognise the specialist support needed for our children and pupil whose vulnerability is significantly increased due to the impact of their previous history of harm, their vulnerability as children and the specialist placement we offer to children who have already been subject to harm and exploitation.

Oaklea Grange School seeks to protect children and pupil against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

The Head of Education 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 SMSC curriculum, ALN policy, assembly policy, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

With effect from 1st July 2015 all schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability, and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of pupil.

Oaklea Grange School, like all other schools, is required to identify a **Prevent Single Point of Contact** (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead.

The SPOC for Oaklea Grange School is: The Head of Education

Staff in school will be alert to changes in a pupil 's behaviour or attitude which could indicate that they are in need of help or protection. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC (Head of Education), or to one of the other designated safeguarding leads if the Head of Education is unavailable.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but the majority of pupil 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, drug/alcohol issues or be specifically related to the needs of that pupil.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy

- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Further indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

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.

Extremism is the demonstration of unacceptable behaviour by using any means or medium to express views which:

- a) Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- b) Seek to provoke others to terrorist acts;
- c) Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- d) Foster hatred which might lead to inter-community violence in the UK.

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.

Pupils 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.**

Indicators of vulnerability include:

Identity Struggles – the pupil / pupils is distanced from their cultural / religious heritage and experiences discomfort about their place in society;

Personal Struggles – the pupil / pupils 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 pupil/ pupils' 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 pupil / pupils may have perceptions of injustice; a feeling of failure; rejection of civic life;

Unmet Need – the pupil may suffer as a result of family displacement, development trauma and disrupted patterns of attachment as a result of abuse and neglect during their formative years and beyond. This will impact on their ability to manage and maintain positive, safe and protective relationships.

Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

Special Educational Need – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all pupils experiencing the above are at risk of radicalisation for the purposes of violent extremism.

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
- Joining or seeking to join extremist organisations
- Significant changes to appearance and / or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSP.

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

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

- Green Lanyard – Visitors have full enhanced DBS clearance which will be checked by the school's business administrator
- Orange Lanyard – Visitors do not have the required enhanced DBS clearance and must be always accompanied whilst on site

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

- ☐ Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- ☐ The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

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

Missing pupils

Our procedures are designed to ensure that a missing pupil is found and returned to effective supervision as soon as possible

If a pupil goes missing, we will make immediate contact with their parent, guardian or caregiver. If the pupil is in the care of the local authority we will follow their individual risk management plan, according to need, and follow all local and specific missing pupil protocols.

When a pupil who goes missing from education this is a potential indicator of abuse, neglect or unmet need, including criminal and/or sexual exploitation, FGM, forced marriage or travelling to conflict zones. Oaklea Grange School staff will be alert to these safeguarding concerns when a pupil goes missing for an extended period, or on repeat occasions.

The school will work closely with the parents/caregivers if any pupil fails to attend school regularly or has been absent without the school's permission for a continuous period of 2 days or more. The school will also notify the placing local authority of any pupil who is to be deleted from the admission register because s/he is not attending.

When the pupil returns to school following a missing episode, a return/wellbeing meeting will be offered to support the pupil on health, wellbeing and welfare grounds. This will be carried out by the designated key teacher or an identified adult that the pupil feels comfortable to talk to or meet with.

What we do when we are concerned:

Staff at Oaklea Grange School- are trained to use our online system called Sleuth to report any concerns which immediately notifies the DSP/DDSP. Notifications are set to alert the director of education (DoE) for *certain* level concerns. Staff members once concerns have been escalated to the DSP/DDSP will **not** see the concern again nor be notified of the updates/outcomes.

Staff can use the safeguarding report form located within the policy below and also have copies of the form readily available in specific locations across the school. 1. School office 2. Staff tray.

Visitors- visitors are given a welcome guide to read before they visit the school which explains the reporting process if they find they may need to report a concern. A copy of the safeguarding report form is available within the policy below and within the visits tray.

All concerns are reported to the DSP/DDSP who action appropriate next steps.

Safeguarding Reporting Form

Name of person completing this form:		Signature of person completing this form:	
Name of Young Person: Log number:			
Date:		Time:	
Location of incident/concern:			
Details of Concerns: Please record factually when the incident or concern occurred. Was there anyone else involved or present? What exactly was said, seen, heard, smelled etc that caused concern? Please use quotation marks for the young person's exact words. Please use the space on the reverse of this form if required. PLEASE DO NOT DISCUSS THIS INCIDENT OR CONCERN WITH ANYONE OTHER THAN THE DSP, DDSP OR ACTING DSP			

Please continue on the reverse of this form.

Details of concern (continued)

Were there any other young people involved in this incident or concern? (Please circle)	Yes/No	Details
Were there any other staff involved in this incident or concern?	Yes/No	Details
Have you discussed this incident or concern with anyone prior to completing this form? (Please circle)	Yes/No	Details
Name of the person completing this form:		
Signature of the person completing this form		
Date this form was completed:		
Name of the Designated Safeguarding Lead this form has been passed to:		

Below only to be completed by Senior/Designated Safeguarding Person (DSP) overseeing the case:

Name of DSP/DDSP:

Action Taken by DSP/ DDSP:

Name of Duty Officer at Social Services/Police (if necessary):

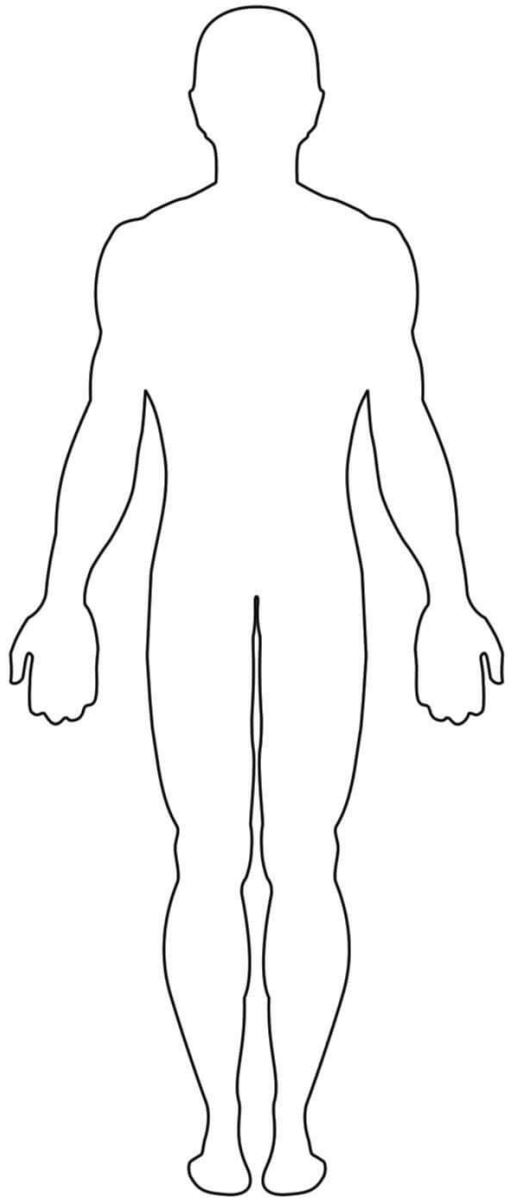
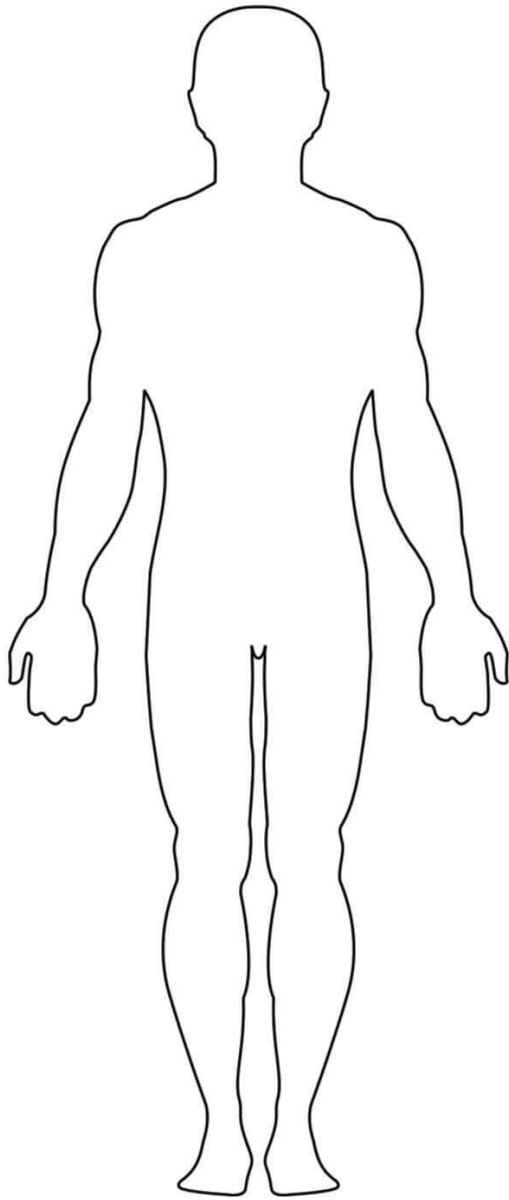
Address:

Phone:

Signed (DSP/DDSP):

Position:

Date:





Safeguarding Cause for Concern Procedures Quick Reference Guide

If a member of staff has any concern regarding a potential safeguarding issue

The member of staff is to complete a Safeguarding Report Form, remove the page from the book and pass to the DSP/in a sealed envelope. This form will record the following information.

1. Name (pupil)
2. Time and Date
3. The pupil's disability, communication needs or level of functioning
4. **Description** of any physical injuries in detail, including a sketch on the body map below (staff **may not** conduct a physical examination of a pupil / young person to complete this information). This may only be done by a registered medical practitioner (doctor).
5. Description of any contact or suggestions of a sexual nature.
6. Description of any verbal abuse, bullying, intimidation or other form of emotionally damaging action, e.g. neglect or ostracism.
7. What was observed, when and by whom it was observed
8. Any comment by the victim or another person which might identify the potential abuser or give a clue as to how the injury might have occurred, preferably quoting actual words used.
9. Any relevant factual observations about the victim.
10. Those giving the information should sign off the relevant entries and should be signed off by the DSP.

Pupil's disclosures

- ☐ A victim of abuse is likely to be under some degree of emotional stress and the staff member may be the only person they are prepared to trust.
- ☐ When information is offered in confidence, staff will need to act tactfully and sensitively to disclosures.
- ☐ Do not show horror, gasp or revulsion as this will upset the pupil further. Instead staff should offer empathic support and respond appropriately to the individual's decision to offer them their trust.
- ☐ Alongside this reassurance, the staff member will need to explain the need for others to be informed and that they may need to take action swiftly to safeguard others.
- ☐ Staff need to be aware, not only of the pupil's anxieties & feelings in this situation, but also of their own feelings on abuse.
- ☐ It is tragically the case that a tiny minority of staff caring for vulnerable children have themselves been guilty of abuse.

Senior staff members involved in recruitment have undergone Safer Recruitment Training. DBS and reference checks are not fool-proof and will only reveal those whose tendency to abuse has been identified by others. It is vital to maintain the relationship of trust with children. Any abuser should be reported to the or Proprietor where appropriate and not implicated so that investigations may take place.

The will:

Notify the relevant agencies and if relevant parents / caregivers, with the time and date recorded, and any follow up action recorded, using school recording and reporting procedures.

Record Keeping training is delivered all staff members upon induction.

Reporting Safeguarding concern directly to Local Authority

Important: We draw attention to the following- that any individual has the right to report a safeguarding concern to the relevant local authority team directly:

Any person with concerns or suspicions about a pupil in Flintshire being harmed should contact:

The Duty Social Worker, Duty and Assessment Team, Social Services for Children, County Offices, Chapel Street, Flint, CH6 5BD.

Telephone: **01352 701000**

If you wish to contact outside of office hours, please telephone the Duty Social Worker on: **0345 0533116**

You can also inform ESTYN (the regulator) directly.

You may raise a Whistleblowing or Civil Service Code concern with any of the following.

The Whistleblowing / Civil Service Code Nominated Officers are:

Phil Sweeney Corporate Services

029 20446430

Cheryl Davies Head of Direct Services & Stakeholder Engagement

029 20446472

Clive Phillips Assistant Director

029 20446451

Robert Gairey Estyn's Complaints Manager (whistleblowing administrator)

029 20446309

North Wales Report form accessed from here:

Social Services will risk assess the situation and take action to protect the pupil as appropriate either through statutory involvement or other support. This may include making a report to the local authority.

[North Wales Report Form \(Children and Families\) • North Wales Safeguarding Board](#)

For further information and support regarding Safeguarding, please access:

- The Wales Safeguarding Procedures - detailing the essential roles and responsibilities for practitioners to ensure that they safeguard children and adults who are at risk of abuse and neglect. The All Wales Practice Guides provide support on safeguarding in a range of areas, including online abuse and pupil sexual exploitation.

<https://safeguarding.wales/>

- Guidance for education settings on peer sexual abuse, exploitation and harmful sexual behaviour, providing practical tools to prevent and respond to instances of peer sexual abuse, exploitation and harmful sexual behaviour taking place both inside and out of the settings, including digital abuse, harmful sexual behaviour and exploitation.
<https://gov.wales/sites/default/files/publications/2020-10/guidance-for-education-settings-on-peer-sexual-abuse-exploitation-and-harmful-sexual-behaviour.pdf>
- Violence against women, domestic abuse and sexual violence (VAWDASV) guidance for governors and a Toolkit for education staff containing best practice.
<https://gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>
- Support from School Community Police Officers, who can work closely with schools to deliver education on substance misuse and wider community and personal safety issues at all key stages of the curriculum. If you would like to contact your School Community Police Officer, please get in touch by emailing communication@schoolbeat.org.
- SchoolBeat.cymru provides information and resources for pupils, teachers, parents and partners to reinforce the key messages delivered by the Community Officers. The website focuses on the three main themes of the Programme: drug and substance misuse, personal safety and safeguarding, and social behaviour and community.
<https://schoolbeat.cymru/>
- The National Action Plan preventing and responding to pupil sexual abuse, which has several resources for practitioners, parent/carers and children and pupil. You can contact your regional Safeguarding Children Board for further information about available resources and learning opportunities.
<https://gov.wales/sites/default/files/publications/2019-07/national-action-plan-preventing-and-responding-to-pupil-sexual-abuse.pdf>
- The Professionals Online Safety Helpline - The helpline is available to anyone working with children and pupil dealing with any online safety issues. We mostly hear from schools, but we support all sorts of people and organisations such as police, social care, sports clubs, churches, mosques and other places of worship, further education settings, small charities, soft play spaces, and more.
[Professionals Online Safety Helpline - UK Safer Internet Centre](#)

Date:	Changes:	Who?
13/09/2024	Photo updates	NM
12/10/2024	Group B Safeguarding for all staff Sleuth update Supplementary guidance for Safeguarding from September 2024 – reviewed by SLT and actioned within the SG audit	NM DG DS
16/06/2026	Name and photo changes to Headteacher and DSP	AB

