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| Logo, icon  Description automatically generated | The DellOut of School ClubRegistered Charity No. 1038546 | Policy No.**DP 1.01a** Page1 of 39**Safeguarding and Child Protection** Amended 12 Jan 2023 |

**Child Protection and Safeguarding Policy**

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| **CONTENTS** |

|  |  |
| --- | --- |
| **1** | Introduction |
| **2** | Statutory Framework |
| **3** | The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) |
| **4** | The management of safeguarding (Governing Body, proprietors, and management committees)  |
| **5** | When to be concerned |
| **6** | Dealing with a Disclosure |
| **7** | Record Keeping |
| **8** | Confidentiality |
| **9** | Dell Procedures |
| **10** | Communication with parents |
| **11** | Allegations of abuse made against adults who work with children and young people. |
| **Appendix 1** | Link to Keeping Children Safe in Education (KCSiE) DfE, 2022* Part One or Annex A: Information for all school and college staff
* Annex B: Further information
* Updates from KCSiE (DfE, 2022)
 |
| **Appendix 2** | Declaration for staff: Child Protection Policy and KCSiE (DfE 2022) |
| **Appendix 3** | Actions where there are concerns about a child. |
| **Appendix 4** | Operation Encompass – Information sharing notifications from Police regarding Domestic Abuse and episodes of Children Missing from Home and Education |
| **Appendix 5** | Ofsted School Inspection Handbook for September 2022 |
| **Appendix 6** | Online Safety Guidance |
| **Appendix 7** | GDPR, Data Protection and Freedom of Information |
| **Appendix 8** | Key policy changes and updates within this version of the policy |

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| 1. **INTRODUCTION**
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Safeguarding is defined as: *protecting children from maltreatment, preventing impairment of children’s health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes* (Working Together to Safeguard Children, DfE, 2018, p6).

This Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of Dell staff and volunteers. All staff should be aware of systems within their setting which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

* child protection policy, which should amongst other things also include the policy and procedures to deal with child-on-child abuse;
* behaviour policy which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.
* staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing as well as acceptable use of technologies, staff/pupil relationships and communications including the use of social media;
* safeguarding response to children who go missing from education; and also, important that staff determine how best to build trusted relationships with children and young people which facilitates communication;
* role of the DSL including the identity of the DSL and any DDSLs.
* copy of Part One Keeping Children Safe in Education (2022) and should be signed to say it has been read and understood. Annex B Further information
* Annex A, condensed version of Part one of KCSiE (DfE 2022). It can be provided (instead of Part one) to those staff who do not directly work with children.

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| **Purpose of the Child Protection Policy** | To inform staff, parents, volunteers and trustees about The Dells responsibilities for safeguarding children.To enable everyone to have a clear understanding of how these responsibilities should be carried out. |
| **Hertfordshire Safeguarding Children Partnership Procedures** | The Dell follows the procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedures and practice for all agencies in Hertfordshire working with children and their families.<https://hertsscb.proceduresonline.com/index.htm> |
| **Staff & Volunteers and contract workers such as visiting entertainers** | All Dell Staff, including supply staff, volunteers and contract workers have a responsibility to provide a safe environment in which children can learn. Staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children. All staff will receive appropriate safeguarding children training, including online training – Hertfordshire Safeguarding Children Partnership advises that this training be updated every three years), so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse and neglect and of the appropriate procedures to follow. In addition, all staff members receive safeguarding and child protection updates ( via email, staff meetings and supervisions), as required, but at least termly, to provide them with relevant skills and knowledge to safeguard children effectively.Any contractors/entertainers and volunteers will be made aware of the safeguarding policies and procedures by the DSL, including The Child Protection Policy and Staff Behaviour Policy (code of conduct)  |
| **The Dells Commitment to Child Protection and Safeguarding**  | Establish and maintain an ethos and culture where children feel secure, are encouraged to talk, and are listened and responded to when they have a worry or concern.Establish and maintain an ethos and culture where school staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and well-being of a child.Ensure children know that there are adults at The Dell whom they can approach if they are worried.Ensure that children, who have additional/unmet needs are supported appropriately. This could include referrals to Early Help Services or Child Protection Contact Referrals to specialist services if they are a child in need or have been / are at risk of being abused and neglected.Consider how children may be taught about safeguarding, including online, through play and learning activities.Staff members working with children are advised to maintain an attitude of ‘it could happen here’ and ‘it could be happening to this child’, where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.  |
| **Implementation, Monitoring and Review of the Child Protection Policy** | The policy will be reviewed at least annually by the trustees. It will be implemented through The Dells induction programme, and as part of day-to-day practice. Compliance with the policy will be monitored by the DSL and through staff performance measures. |

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| 1. **STATUTORY FRAMEWORK**
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In order to safeguard and promote the welfare of children, The Dell will act in accordance with the following legislation and guidance:

* The Children Act 1989
* The Children Act 2004
* Children and Social Work Act 2017
* Education Act 2002 (Section 175/157)

 *Outlines that Local Authorities and School Governing Bodies have a*

 *responsibility to “ensure that their functions relating to the conduct of school*

 *are exercised with a view to safeguarding and promoting the welfare of children*

 *who are its pupils”.*

* Hertfordshire Safeguarding Children Partnership Procedures Manual (Electronic)
* Keeping Children Safe in Education (DfE, September 2022)
* Working Together to Safeguard Children (DfE 2018)
* The Education (Pupil Information) (England) Regulations 2005
* Sexual Offences Act (2003)
* Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
* Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
* Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry(whether or not the forced marriage takes place).
* Serious Violence Strategy 2018
* Equality Act 2010
* The Human Rights Act 1998
* Apprenticeships, Skills, Children and Learning Act 2009
* Sexual violence and sexual harassment between children in schools and colleges (DfE 2021)

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| **3. THE DESIGNATED SAFEGUARDING LEAD**  |

The Dell will always ensure an appropriate **senior member** of staff, is appointed to the role of DSL.

During term time and our holiday club a DSL will always be available for staff at The Dell to discuss any safeguarding concerns.

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| DSL at Morgans | Karen Claydon | DSL at Abel Smith | Carole Peacock |
| DDSL  | Maisie Barraclough | DDSL  | Gemma Skelton |
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| Morgans Holiday club | On a duty DSL basis any of the above from Morgans or Abel Smith  |  |  |
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**The broad areas of responsibility for the DSL are:**

* Managing Child Protection Contact Referrals and cases.

* Completing Child Protection Contact Referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern.
* Liaise with the Head Teacher at our host school to inform them of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
* Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection Contact Referral by liaising with relevant agencies.
* Support staff who make Child Protection Contact Referrals and other service referrals.
* Share information with appropriate staff in relation to a child’s looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.

**Training KCSiE (DfE, 2022)**

The DSL should undergo formal training specific to their safeguarding role and duties at least every two years. They should also undertake Prevent Awareness training every 3 years and Home Office online training on an annual basis at a minimum.

In-between formal training a DSL/DDSL’s knowledge and skills should be refreshed (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). This training should provide the DSL with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children’s social care, so they:

1) Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements

2) Have a working knowledge of how Hertfordshire conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

3) Understand the importance of the role the DSL has in providing information and support to local authority children social care, in order to safeguard and promote the welfare of children

4) Understand the lasting impact that adversity and trauma can have, including on children’s behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes

5) Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers

6) Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners

(Full details in Chapter one of Working Together to Safeguard Children)

7) Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation

8) Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college

9) Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online

10) Obtain access to resources and attend any relevant or refresher training courses and

11) encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

**Raising Awareness: The DSL (DDSL) should:**

* Ensure all staff including part time, contractors, volunteers and have access to, and understands The Dells child protection policy and procedures, especially new and part-time staff
* Work with the trustees to ensure that The Dells child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
* Ensure the safeguarding and child protection policy is available publicly and that parents know that referrals about suspected abuse or neglect may be made and the role of the school/college in this.
* Link with Hertfordshire Safeguarding Children’s Partnership (HSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements.
* Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with our staff team. The DSL/DDSL should have details of the child’s social worker.

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| 1. **THE MANAGEMENT OF SAFEGUARDING**

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The Dell Trustees ensure that they comply with their duties under legislation. They must also have regard to KCSiE to ensure that the policies, procedures and training at The Dell are effective and comply with the law.

**All Trustees should assure themselves that the safeguarding policies and procedures at The Dell are in place and are effective and support the delivery of** a robust approach to safeguarding. Their training should be regularly updated.

The nominated Trustees, responsible for child protection are:

Helen Fellows & Kieran Tucker

* The Managers of The Dell should ensure that the policies and procedures, adopted by the Management Committee particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by staff.
* The Trustees should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, as well as the local multi-agency safeguarding arrangements
* According to the Equality Act, we **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
* Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on The Dell in relation to safeguarding and promoting the welfare of children, the trustees should carefully consider how they are supporting their users with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.
* The Dell has a duty with regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

**The Dells approach to safeguarding**

* The Dell Trustees should ensure that they facilitate a wholistic approach to safeguarding. This means involving everyone at The Dell and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the **best interests** of the child at their heart.
* Where there is a safeguarding concern, the trustees and Managers should ensure the child’s wishes and feelings are taken into account wherever they can.
* Our Safeguarding policies and procedures (some of which are listed below) should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

**Safeguarding policies and procedures**

These policies at The Dell include having the following; -

* an **effective child protection policy**
* a **behaviour policy**, which includes measures to prevent bullying (including cyberbullying, and discriminatory bullying)
* a **staff behaviour policy** (included within our staff handbook) which includes a code of conduct, low-level concerns, allegations against staff and whistleblowing, plus acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
* Managers should take a risk-based approach to the level of information that is provided to temporary staff, volunteers, and contractors.

In addition, The Dell ensures any:

* **child protection files** are maintained as set out in Annex C of KCSiE
* **appropriate safer recruitment policies** in accordance with Part three of KCSiE are in place, embedded and effective and,
* where reasonably possible, for The Dell to hold **more than one emergency contact number** for each attendee. This goes beyond the legal minimum. It is good practice to give The Dell additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern
* Trustees should ensure an appropriate **senior member** of staff, is appointed to the role of DSL. The DSL should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder’s job description.

The role carries a significant level of responsibility and where necessary the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.

The Dell have decided to have more DDSLs. Any DDSLs are trained to the same standard as the DSL.

**Multi-agency working**

The Dell should ensure that staff contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

Safeguarding partners, the Hertfordshire Safeguarding Children Partnership (HSCP) are the 3 organisations responsible for the partnership arrangements for keeping children safe (Hertfordshire County Council, Hertfordshire Constabulary and The Hertfordshire and West Essex Integrated Board) will make arrangements to work together with appropriate relevant agencies, to safeguard and promote the welfare of local children, including identifying and responding to their needs.

HSCP create a procedures manual which sets out how they will work together and with any relevant agencies.

Working Together to Safeguard Children indicates that all providers should be fully engaged, involved, and included in safeguarding arrangements.

It is especially important that The Dell understands its role within the local safeguarding arrangements. Trustees and their DSL should make themselves aware of and follow their local arrangements.

The Dell Managers should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the safeguarding partners.

The Dell should work with local authority children’s social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

**Information sharing**

As part of meeting a child’s needs, it is important for the trustees to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within the Dell and with local authority children’s social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

The Dell should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children’s social care.

Our trustees are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Trustees ensure staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.

This includes:

* being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’.
* understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk, and
* Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Where the child has left or transferred schools any information held within the child protection file should be given to the host school for secure onward transmission to their new school. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the ‘Channel’ programme and can have that support in place for when the child arrives.

**Staff Training**

The Dell ensure that all staff receive safeguarding and child protection training, including online safety, at induction. This training is updated and refreshed every 3 years alongside additional on the job training through coaching and team meetings.

All staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually.

The Dell trustees recognise the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis. Staff are provided with the opportunity to contribute to, and shape, safeguarding arrangements and the child protection policy.

**Opportunities to teach safeguarding.**

The Dell uses opportunities to ensure that children are taught about how to keep themselves and others safe including online It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

**Safeguarding concern or allegations made about another staff member**

The Dell ensures that there are procedures in place to manage **any** safeguarding concerns (no matter how small) or allegations that **do not** meet the harm threshold, about staff members, including supply staff, volunteers, and contractors. This includes those that are considered to be ‘Low-Level’ concerns.

The trustees ensure there are procedures in place for staff to report concerns or allegations that **may** meet the harm threshold about staff members (including supply staff, volunteers, and contractors).

Where a person has been, suspended or dismissed (or resigned) in connection with Safeguarding concerns, The Business Manager will seek to make a referral to the Disclosurs and Barring Service (DBS). **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

Similarly, they will report such incidents to OFSTED as part of the registration procedures and Morton Michel as The Dells insurance provider.

**Child-on-child abuse**

**All** staff should recognise that children are capable of abusing other children (including online). All staff should be clear about their school’s or college’s policy and procedures with regard to child-on-child abuse.

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| 1. **WHEN TO BE CONCERNED**
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**All** staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology maybe used to facilitate offline abuse. Children maybe abused by an adult or adults or by another child or children.

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| **Physical abuse**A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. |
| **Indicators in a child/ young person** |
| Bruises – shape, grouping, site, repeat or multiple | Withdrawal from physical contact |
| Bite-marks – site and sizeBurns and Scalds – shape, definition, size, depth, scars | Aggression towards others, emotional and behaviour problems |
| Improbable, conflicting explanations for injuries or unexplained injuries | Frequently absent from school |
| Untreated injuries | Admission of punishment which appears excessive |
| Injuries on parts of body where accidental injury is unlikely | Fractures  |
| Repeated or multiple injuries | Fabricated or induced illness  |

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| **Emotional abuse**The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. |
| **Indicators in a child/ young person** |
| Self-harm | Over-reaction to mistakes / Inappropriate emotional responses  |
| Chronic running away | Abnormal or indiscriminate attachment |
| Drug/solvent abuse | Low self-esteem  |
| Compulsive stealing | Extremes of passivity or aggression |
| Makes a disclosure | Social isolation – withdrawn, a ‘loner’ Frozen watchfulness particularly pre school  |
| Developmental delay | Depression |
| Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking) | Desperate attention-seeking behaviour |

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| **Neglect** The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. |
| **Indicators in a child/ young person** |
| Failure to thrive - underweight, small stature  | Low self-esteem |
| Dirty and unkempt condition | Inadequate social skills and poor socialisation |
| Inadequately clothed | Frequent lateness or non-attendance at school |
| Dry sparse hair | Abnormal voracious appetite at school or nursery |
| Untreated medical problems | Self-harming behaviour |
| Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold | Constant tiredness |
| Swollen limbs with sores that are slow to heal, usually associated with cold injury | Disturbed peer relationships |

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| **Sexual abuse**Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it. |
| **Indicators in a child/ young person** |
| Self-harm - eating disorders, self-mutilation and suicide attempts | Poor self-image, self-harm, self-hatred |
| Running away from home | Inappropriate sexualised conduct |
| Reluctant to undress for PE  | Withdrawal, isolation or excessive worrying |
| Pregnancy | Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit  |
| Inexplicable changes in behaviour, such as becoming aggressive or withdrawn | Poor attention / concentration (world of their own) |
| Pain, bleeding, bruising or itching in genital and /or anal area | Sudden changes in schoolwork habits, become truant |
| Sexually exploited or indiscriminate choice of sexual partners |  |

If staff have any concerns about a child’s welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the DSL/DDSL. The DSL/DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to a safeguarding concern.

**Any staff member should be able to make a Child Protection Contact Referral to Children’s Services if necessary.**

All staff should be aware of the process for making Child Protection Contact Referrals to Children’s Services for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a Contact Referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

**Options will then include:**

* Managing any support for the child internally via our own staff team
* Completing a Families First Assessment or making a request for early help support.
* A Child Protection Contact Referral for statutory services, as the child suffering / likely to suffer significant harm from abuse or neglect.

**Extra Familial Harm/Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside The Dell or our host schools and/or can occur between children outside the setting

All staff, but especially the DSLs and their Deputies should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

**A child centred and coordinated approach to safeguarding.**

Safeguarding and promoting the welfare of children is **everyone’s responsibility.** In order to fulfil this responsibility effectively, each professional should make sure their approach is **child centred**. This means that they should consider, at all times, what is in the best interests of the child.

The Dell and our staff together with our host schools form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests** of the child at all times.

**Children who may require early help (known as Families First in Hertfordshire)**

Families First is Hertfordshire's strategy for early help for families. A directory of early help services is available at[www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) which will help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child’s needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any ongoing/escalation of concerns so that consideration can be given to a Child Protection Contact Referral to Children’s Services if the child’s situation doesn’t appear to be improving.

If early help is appropriate, the DSL or a DDSL will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

**Any child may benefit from early help, but Dell staff should be particularly alert to the potential need for early help for a child who:**

* is disabled or has certain health conditions and has specific additional needs.
* has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
* has a mental health need.
* is a young carer.
* is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
* is frequently missing/goes missing from care or from home.
* is at risk of modern slavery, trafficking, sexual or criminal exploitation.
* is at risk of being radicalised or exploited.
* has a family member in prison or is affected by parental offending.
* is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
* is misusing alcohol and other drugs themselves.
* has returned home to their family from care.
* is at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage
* is a privately fostered child, and
* is persistently absent from education, including persistent absences for part of the school day.

Staff members should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect** as well as being aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.

Children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Barriers can exist when recognising abuse and neglect in this group of children.

This can include:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s impairment without further exploration.
* these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
* The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs and
* Communication barriers and difficulties in managing or reporting these challenges.
* Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or college or the consequences of doing so.

**Child-on-child abuse**

**All** staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school’s or college’s policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

**All** staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their DSL (or DDSL).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

* Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
* abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
* Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. (This may include an online element which facilitates, threatens and/or encourages physical abuse)
* Sexual violence, such as rape, assault by penetration and sexual assault. (This may include an online element which facilitates, threatens and/or encourages sexual violence)
* Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
* causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
* consensual and non-consensual sharing of nude and semi-nude images and/or videos11 (also known as sexting or youth produced sexual imagery)
* upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
* initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

In order to minimise the risk of child-on-child abuse The Dell

* Provides a developmentally appropriate PSHE and RSE curriculum which develops pupils’ understanding of acceptable behaviour and keeping themselves safe. This may be a session about being kind to one another or talking about positive behaviour. It might be role modelling and getting the older children to help our younger children in a session or with their activites.
* Has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed, and valued. For example, if a child says something inappropriate to another child or uses physical or aggressive behaviour to another child. Or if a child feels uncomfortable with activities other children are asking them to participate in...
* Ensure victims, perpetrators and any other child affected by child-on-child abuse will be supported.
* Develops robust risk assessments where appropriate.
* Have relevant policies in place (e.g., behaviour policy).

Where there is an allegation or concern that a child has abused others, Section 5.1.7 of the Hertfordshire Safeguarding Children Partnership Procedures Manual, ‘Children Who Abuse Others’:

<http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html>

**Child-on-child sexual violence and sexual harassment**

* When responding to concerns relating to child-on-child sexual violence or harassment, The Dell will follow the guidance outlined in Part five of /KCSIE 2022.
* The Dell recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of ‘it could happen here.’ We recognise sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
* All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
* Abuse that occurs online or outside of the school/college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
* The Dell recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.
* The Dell recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
* The DSL (or DDSL) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
* The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and HSCP procedures.
* The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
* Reports will initially be managed internally by the school/college and where necessary will be referred to Children’s Services and/or the police.

**Important considerations which may influence this decision include:**

* the wishes of the victim in terms of how they want to proceed.
* the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
* the ages of the children involved.
* the developmental stages of the children involved.
* any power imbalance between the children.
* if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
* that sexual violence and sexual harassment can take place within intimate personal relationships between children.
* understanding intra familial harms and any necessary support for siblings following incidents.
* whether there are any ongoing risks to the victim, other children, adult students, or Dell staff.
* any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The Dell will in most instances engage with both the victim’s and alleged perpetrator’s parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children’s Services and/or the police) to ensure a consistent approach is taken.

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

* Increased absence from school
* Change in friendships or relationships with older individuals or groups.
* Significant decline in performance
* Signs of self-harm or significant change in wellbeing
* Signs of assault or unexplained injuries
* Unexplained gifts/new possessions

Also refer to Schools Toolkit the characteristics of young peoples’ vulnerability to CSE and CCE on the HGFL;<https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/specific-safeguarding-issues/child-sexual-and-criminal-exploitation>

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

**Mental Health**

**All** staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or a DDSL.

**Prevent: Safeguarding Children and Young People from Radicalisation**

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

All childcare providers based in schools are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may be in need of Prevent support.

The Dell will act proportionately to the concern using the Prevent ‘notice, check, share’ approach, which may lead to the DSL making a Prevent referral.  If there is an immediate threat, the police will be contacted via 999.

Local Hertfordshire County Council guidance on Prevent is featured at 5.3.9 of the Hertfordshire Safeguarding Children’s Partnership CP procedures

<https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html>

**Domestic Abuse**

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. See Appendix 4 for information regarding Operation Encompass.

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| **6. DEALING WITH A DISCLOSURE** |

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child’s age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

* Listen to what is being said without displaying shock or disbelief
* Accept what is being said.
* Allow the child to talk freely.
* Reassure the child, but not make promises which might not be possible to keep.
* Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
* Reassure him or her that what has happened is not his or her fault.
* Stress that it was the right thing to tell.
* Listen, only asking questions when necessary to clarify what is being said.
* Not criticise the alleged perpetrator.
* Explain what has to be done next and who has to be told.
* Make a written record (see Record Keeping)
* Pass the information to the DSL without delay (if a DSL or DDSL is not available, staff must inform a senior member of staff or complete a child protection contact referral if this disclosure indicates that the child may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children’s Services where necessary is not delayed).

**Third Party Disclosures**

Its everyone’s responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse.

Therefore, when safeguarding concerns are shared to the DSL at The Dell by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of The Dell. If unsure of how to do this speak to the DSL and they will advise accordingly.

**Support**

Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

**If the Dell receives a disclosure about potential harm caused by another staff member, they should see section 11 of this policy– *Allegations involving l staff/volunteers.***

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| **7. RECORD KEEPING** |

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL. Staff will:

* Record as soon as possible after the conversation. Use the schools Child Protection Recording system which may be electronic or using a record of concern sheet (pro-forma available on the Hertfordshire Grid for Learning).
* Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the child.
* Use the body map on the school’s recording system or the proforma body map available on HGFL, to indicate the position of any injuries and a clear description of the injury.
* Record statements and observations rather than interpretations or assumptions.
* Do not destroy the original records in case they are needed by a court.
* All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The DSL/DDSL will have access to safeguarding records and will ensure that all records are managed in accordance with the Education (Pupil Information) (England) Regulations 2006.

Safeguarding records, The Herts Grid

<https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/safeguarding-records>

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| **8. CONFIDENTIALITY** |

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

* All staff have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies.
* Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

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| **9. PROCEDURES** |

**Please see Appendix 3 – KCSiE 2022 pg.22**

If any member of staff is concerned about a child, he or she must inform the DSL. The DSL will decide whether the concerns should be raised to Children’s Services and if deemed to have met the threshold for a Child Protection Contact Referral to be completed. If a Child Protection Contact Referral to Children’s Services is made the DSL will discuss the referral with the parents, unless to do so would place the child at further risk of harm.

While it is the DSL’s role to make Child Protection Contact Referrals, any staff member can make a Child Protection Contact Referral to Children’s Services if a child is in immediate danger or is at risk of harm (e.g., concern that a family might have plans to carry out FGM, Forced Marriage etc). In these circumstances a Child Protection Contact Referral should be made to Children’s Services and/or the Police immediately. Where Child Protection Contact Referrals are made by another member of staff, the DSL should be informed as soon as possible.

If a member of staff (persons employed or engaged to carry out teaching work at schools and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police via 101. **This is a mandatory reporting duty.** KCSiE (DfE 2022) pg. 152-153:

If the allegations raised are against other children, the school should follow section 5.1.17 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. Please see the school’s anti-bullying policy for more details on procedures to minimise the risk of child-on-child abuse.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise and a factual account of any verbal disclosures and observations (record of concern pro-forma is available on the Hertfordshire Grid for Learning).

Particular attention should be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a Child Protection Plan and a written record will be kept.

If a pupil who is/or has been the subject of a child protection plan changes school, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school, in a secure manner, and separate from the child’s academic file.

The DSL is responsible for making the senior leadership team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.

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| 1. **COMMUNICATION WITH PARENTS**
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The Dell will ensure the Child Protection Policy is available publicly via the website with a hard copy available at our host schools.

Parents should be informed prior to a Child Protection Contact Referral, unless it is considered to do so might place the child at increased risk of significant harm by:

* The behavioural response it prompts e.g., a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed.
* Leading to an unreasonable delay.
* Leading to the risk of loss of evidential material.
* The school may also consider not informing parent(s) where this would place a member of staff at risk.

The Dell will endeavour to ensure that parents understand the responsibilities placed on the school staff for safeguarding children.

Where reasonably possible the Dell should hold more than one emergency contact number for each pupil and student. KCSiE (DfE 2022) pg. 28.

Further guidance around information sharing can be located within;**Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers** *(*DfE, 2018);

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

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| 1. **ALLEGATIONS OF ABUSE MADE AGAINST ADULTS WHO WORK WITH CHILDREN AND YOUNG PEOPLE**
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An allegation/safeguarding concern is any information which indicates that a member of staff/volunteer/contractor may have:

* Behaved in a way that has harmed a child or may have harmed a child.
* Possibly committed a criminal offence against or related to a child.
* Behaved towards a child or children in a way which indicates he or she would pose a risk of harm to children or
* Behaved or may have behaved in a way that indicated they may not be suitable to work with children.

This relates to members of staff, supply staff, volunteers and contractors who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a member of staff who is no longer employed should be referred to the police. Historical allegations of abuse should also be referred to the police.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children, this is to be referred to the club manager. This includes allegations reported or made by a child, parent or member of the public.

Where the manager is the subject of an allegation or safeguarding concerns, this to be referred to the Business manager or chair of the management committee.

Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.

The name of the Business Manager

Carolyn Gee 07958 521201

The Co Chairs of The Dell -who can be contacted via the following numbers

Helen Fellows or Kieren Tucker : via Tel ;07858 521201 or 07958 521202 or 07432 120678

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a ‘need to know’ basis only.

Actions to be taken include making an immediate written record of the allegation using the informant’s words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Head Teacher.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Chair of Trustees will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO Threshold Guidance may be used to inform this decision – found at

<https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html>

**Children’s Services – 0300 123 4043**

**SOOHS (Out of Hours Service-Children’s Services) – 0300 123 4043**

If the allegation meets any of the four criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer (LADO) without delay and within 24 hours in line with HSCP CP procedures.

If it is decided that the allegation requires a child protection strategy meeting or a joint evaluation meeting, this will take place in accordance with section 5.1.5 of the Hertfordshire Safeguarding Children Partnership Procedures Manual.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed.

The Dell Manager should, as soon as possible, **following briefing** from the LADO inform the subject of the allegation.

**Concerns that do not meet the ‘harm threshold’.**

The Dell may also need to take action in response to ‘low-level’ concerns about staff. Additional information regarding low-level concerns is contained with our staff behaviour policy/code of conduct/low-levels concerns policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

* The Dell has an open and transparent culture in which all concerns about all adults working in or on behalf of the school/college are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of The Dell are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
* A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school/college may have acted in a way that is inconsistent with our staff behaviour policy/code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.
* Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns should be shared confidentially in line with our low-level concerns policy/staff behaviour policy/code of conduct to

Name Carolyn Gee

Role \_\_\_\_\_\_\_\_\_\_\_Business Manager\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

* Where low-level concerns are reported to TheDell , the manager will be informed of all Low level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
* Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
* If The Dell is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
* Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
* Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
* Where a pattern is identified, The Dell will implement appropriate action, for example reviewing the LADO threshold and completing a referral if harm test met.

**For further information see**

Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 [Managing Allegations Against Adults who work with Children and Young People](http://www.proceduresonline.com/herts_scb/chapters/p_manage_alleg.html)

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

* Children’s Services 0300 123 4043
* NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

**What staff should do if they have concerns about safeguarding practices within The Dell?**

* All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or education setting’s safeguarding arrangements.
* Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the school or college’s senior leadership team.

**Safer working practice**

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook/school code of conduct/staff behaviour policy and Safer Recruitment Consortium document, ***Guidance for safer working practice for those working with children and young people in education settings (February 2022)*** available at

<https://www.saferrecruitmentconsortium.org/>

The document seeks to ensure that the responsibilities of The Dell towards children and

staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise

behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment **(**School Standards and Framework Act 1998**).** Please see the Dells behaviour management policy for more information.

**HSCP escalation and complaints procedure link**

<https://hertsscb.proceduresonline.com/chapters/p_resolution_disagree.html>

**APPENDIX 1: KCSiE (DfE 2022)**

**Part One OR Annex A: Information for all school and college staff**

**Annex B: Further information**



On publication of this Child Protection Policy, September 2022, the CPSLO Service has decided to provide the hyperlink only to KCSiE rather than the document in its entirety, due to the potential for updates to the content.

**All** staff that have direct working with children should have access and have read Part one OR Annex A and Annex B (which provides further information specific forms of abuse and safeguarding issues) of this statutory guidance. Those staff who do not work directly with children should read **either Part one or Annex A** (a condensed version of Part one) of this guidance. This is entirely a matter for The Dell and will be based on their assessment of which guidance will be most effective for their staff to safeguard and promote the welfare of children**.** All Staff should also have the opportunity to seek clarity from designated staff for any content.

This is to assist staff to understand their role and discharge their responsibilities as set out in this guidance.

We highly recommend that staff are asked to sign to say they have read these sections (please see Appendix 2 below) and should subsequently be re-directed to these documents again should any changes occur.

**Link to KCSiE (DfE, 2022):**

[Keeping children safe in education 2022 (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)

**Annex F KCSiE (DfE 2022): Substantive changes from September 2022:**

**APPENDIX 2:**

**DECLARATION FOR STAFF**

**Child Protection Policy and KCSiE DfE 2022**

**The Dell Out of School Club** Date ……………………..

Please sign and return to…Karen Claydon/Carole Peacock (DSL) by 28th Feb 23……

I, *insert your name***\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these document(s).:

(1) The Dells Child Protection Policy

(2) **Part One (OR Annexe A & B)** of **'Keeping Children Safe in Education'** DforE Guidance, 2022

I am aware that the Designated Safeguarding Leads (DSL) and Deputy Designated Safeguarding Lead (DDSL) are :

Karen Claydon – Morgans DSL Carole Peacock Abel Smith DSL

Maisie Barraclough Morgans DDSL Gemma Skelton Abel Smith DDSL

and I am able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available in the policies file or online on the Dells website.

Signed\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**APPENDIX 3:**

**ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD**

**Flowchart**



Page 22 of KCSIE 2022

**The National Police Chiefs' Council- *When to call the police* guidance.**

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

• Assault

• Criminal damage

• Cyber crime

• Drugs

• Harassment

• Sexual offences

• Theft

• Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at;

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

**APPENDIX 4:**

Operation Encompass – Information sharing notifications from police regarding Domestic Abuse and episodes of Children missing from Home and Education

The Dell with work with our host schools and other agencies to share information where a concern is raised about domestic abuse or children are missing from education.

**APPENDIX 5:**

**Ofsted school Inspection Handbook September 2021**

This handbook is primarily a guide for inspectors on how to carry out school inspections. However, it is made available to schools and other organisations to ensure that they are informed about the processes and procedures of inspection. It seeks to balance the need for consistency in inspections with the flexibility required to respond to the individual circumstances of each school.

On publication of this Child Protection Policy, September 2022, the CPSLO Service has decided to provide the hyperlink only to the Ofsted School Inspection Handbook rather than the document in its entirety, due to the potential for updates to the content.

[School inspection handbook - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/school-inspection-handbook-eif/school-inspection-handbook)

**APPENDIX 6:**

**Online Safety Guidance**

On publication of this Child Protection Policy, September 2022, the CPSLO Service has decided to signpost to the document rather than provide the document in its entirety, due to the potential for updates to the content.

Hertfordshire Guidance:

<https://thegrid.org.uk/safeguarding-and-child-protection/online-safety/online-safety-national-guidance>

**APPENDIX 7:**

**GDPR, data protection and Freedom of Information**

Annex D KCSIE 2021

The Dell subscribes to the ICO and further information on The Dells GDPR policy can be found on our website

Further information can be accessed at; <https://ico.org.uk/for-organisations/>

**APPENDIX 8:**

**Table of substantiative changes from previous CP policy**

|  |  |
| --- | --- |
| **SECTION OF POLICY** | **CHANGES** |
| **Policy review** |  |
| **1.Introduction** | The Dells commitment to safeguarding and child protection (in Blue)Language change from peer on peer to child-on-on child abuseAddition to staff behaviour policy to include low-level concerns, allegations against staff and whistleblowing. Safeguarding response to children who go missing from education; and also, importance of staff determining how best to build trusted relationships with children and young people which facilitates communication. Contract Workers added to the list of those that should follow the CP PolicyDate change of KCSiE 2021 to KCSiE 2022 throughout |
| **2.Statutory Framework** | Update of 2022 edition of KCSiE referenced.Addition of The Equality Act 2010 (Including Public Sector Equality Duty) and The Human Rights Act 1998 |
| **3.DSL/ DDSL** | Updated section on recommended Training for DSL/ DDSL role as stated in KCSiE 2022Addition of the link to Prevent in Education on the Hertfordshire GridAddition under Raising Awareness section of especially new and part-time staff.Addition of bullet point highlighting that CP Policy should be available publicly. |
| **4.The management of safeguarding (management committees)**  | Addition of new paragraphs providing more detail about the roles of Governing Body, including management committees.Multi-agency working – Making it clear that the Safeguarding partners referred to within KCSiE in Hertfordshire is Hertfordshire Safeguarding Children Partnership (HSCP)Addition of link to Relationship and Sex education (RSE) and health education publication |
| **5.When to be concerned** | Addition of: **All** staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Change in wording under list of reasons why a child may benefit from early help is misusing alcohol and other drugs themselves. Amendment to wording in SEND section.Addition of whole section regarding child-on-child abuseUpdate to section of HSCP to refer to re “Children Who Abuse Others”.Addition of section child-on-child sexual violence and sexual harassmentAddition of paragraph re CSE and CCEAddition of information regarding Mental Health in children and that it can be an indicator child is suffering abuse, neglect or exploitation.Information added to make it clear only trained health professionals should attempt to make a diagnosis of a mental health problem.Updated link to HSCP added.Section regarding Domestic Abuse added |
| **6.Dealing with a Disclosure** | No changes from CP policy 2021 |
| **7.Record Keeping** | No changes from CP policy 2021 |
| **8.Confidentiality** | No changes from CP policy 2021 |
| **9.School Procedures** | KCSiE Pg 152 -153 regarding staff mandatory reporting duty related to Female Genital Mutilation.HSCP section updated.Language peer on peer updated to child-on-child  |
| **10.Communication with parents** | KCSiE 2022 and page number updated re schools/colleges holding more than one emergency contact number  |
| **11.Allegationsof abuse made against adults who work with children and young people.**  | Section added with regards to Concerns that do not meet the “harm threshold” and ‘low level’ concerns.Guidance for safer working practice recent publication date of February 2022 added  |
| **Annex 1. Link to KCSiE (DfE, 2021)****Part One** **or Annex A : Information for all school and college staff****Annex B: Further information****Updates from KCSiE 2021** | **Link to KCSiE (DfE, 2022)** |
| **Annex 2. Declaration for staff:** **Child Protection Policy and (KCSiE) DfE 2021** | Changes made aligned to KSCiE 2022 |
| **Annex 3. Actions where there are concerns about a child** | Now appears on page 22 of KCSiE 2022 |
| **Annex 4. Operation Encompass – Information sharing from Police regarding Domestic Abuse notifications and Children Missing from Education (2nd December 2019)** | The Dell with work with our host schools and other agencies to share information where a concern is raised about domestic abuse or children are missing from education. |
| **Annex 5. Ofsted school Inspection Handbook (September 2021)** | Date change with regards to CP Policy and update July 2022 to Ofsted School Inspection Handbook  |
| **Annex 6. Online Safety** |  |
| **Annex 7. GDPR, data protection and Freedom of Information** |  |
| **Annex 8. Substantive changes in policy listing** | Details of substantive changes to the policy  |
|  |  |

This policy will be reviewed in full by The Dell Committee annually and at our Committee Meeting on 9th Feb 2023.

The policy was last reviewed on 12th Jan 2022 and has been rewritten based on a model policy issued by Herts Safeguarding Board for schools. Key changes are highlighted in yellow and detailed in Appendix 8

The policy is due for review in Jan 24 (up to 12 months from the above date).

Signature …………………………………. Date ……………………

Manger of Morgans

Signature…………………………………………..Date

Manger at Abel Smith

Signature ………………….………………. Date ….…………………

Chair and on behalf of The Dell Trustees