



The Mulberry School

Safeguarding and Child Protection Policy

Date created: 18.02.21

Designated Safeguarding Lead: Denise Williams

Designated Safeguarding Lead (DSL) – Denise Williams

Deputy Designated Safeguarding Lead- Fatumo Artan

Safeguarding Governor- Ayaz Lalani

Proprietor – Nizam Bata

Summary of changes July 2021:

This policy has been revised to reflect the changes to the statutory guidance as outlined below.

| Section | Changes |
|------------|---|
| Throughout | All references to “Keeping Children Safe in Education” (2021) have been removed and replaced with reference to “Keeping Children Safe in Education” (2021) |
| 3 | Amendment to reinforce the fact that child protection should be at the forefront of practice. |
| 3 | Added to incorporate the importance of wishes and feelings and hearing the child’s voice. |
| 3 | Paragraph added in terms of the curriculum for Relationships Education, Relationships and Sex Education and Health Education. |
| 4 | Additional concerns included regarding the early help offered when additional needs of children are identified. |
| 6 | Named mental health lead added to the table on roles and responsibilities |
| 7 | Amended the Annex of KSCIE 2021 from B to C |
| 7 | Added details of the schools safeguarding team working with school staff to promote the educational outcomes for children who have or have had a social worker reach their potential. |
| 13 | Information added regarding victims being reassured, taken seriously and kept safe. |
| 19 | Added information regarding the fact children may not realise they are being exploited. |
| 21 | More details added in terms of CCE and that fact that children may not understand they are being criminally exploited. |
| 17 | Information added to include the fact that abuse can take place in intimate relationships between peers and details about consensual and non-consensual sharing of nudes and semi-nude images and or videos. Amended to include the fact that even if no reports of sexual violence and sexual harassment are being made it does not mean it is not happening. Reinforcing the importance of not accepting peer on peer abuse is “normal”. Amendment made to reinforce the fact that victims will be taken seriously and kept safe. |
| 23 | Information on Modern Slavery added. |
| 27 | Wording amended to reflect the fact the setting should have a named Mental Health Lead. |
| 29 | Information added on Cybercrime |
| 4 | Information added about the additional safeguarding challenges related to children with SEND and the vulnerabilities of children who attend Alternative Provision. |
| 16 | Details added in light of timescales for transferring information. Information added about the importance of sharing information with the receiving setting in advance of the pupil transferring. |
| 11 | Information amended to reflect unsuitable people being appointed or securing volunteering opportunities. Information added in relation to employment history and self-declaration of criminal records. Added to include the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. |

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| 9 | <p>Amended two parts-</p> <ol style="list-style-type: none"> 1. Allegations that may meet the harm threshold 2. Concerns that do not meet the harm threshold <p>Thresholds of harm added</p> <p>Added to clarify the action to take if an allegation is made by an adult who is in a position of trust but not employed by the school.</p> <p>Information added about concerns that do not meet the harm threshold.</p> |
| 34 (New Section) | Use of premises for non-school activities. |

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Key Contacts for Safeguarding and Child Protection at the School

Designated Safeguarding Lead (DSL)

| | |
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| Contact email | Denise Williams – Denise.williams@ibccs.org |
| Telephone | 07852 437925 |

Deputy Designated Safeguarding Lead (DDSL)

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| Contact email | Fatumo Artan Fatumo.artan@ibccs.org |
| Telephone | 0116 4826937 |

Designated Looked After Children Lead

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|----------------------|------------------------|
| Contact email | Denise Williams |
| Telephone | 07852 437925 |

Local Authority Designated Officer (LADO)

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| Telephone | 0116 454 2440 |
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Local Authority Safeguarding contact numbers and emails

During Office Hours

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|------------------|----------------------|
| Telephone | 0116 454 1004 |
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|----------------------|--|
| Contact email | |
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Out of Office Hours

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|------------------|-----------------------------|
| Telephone | 0116 454 1004 Or 111 |
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If you are concerned about extremism in school, or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or email counter.extremism@education.gov.uk

1. Introduction and Summary

All staff are advised to maintain an attitude of “it could happen here” where safeguarding is concerned.

This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction alongside our Staff Code of Conduct, behaviour policy and the safeguarding response to those children who are missing from education. In addition, all staff are provided with Part One of the statutory guidance [‘Keeping Children Safe in Education’](#), DfE (2021).

This policy will be reviewed in full by the Governing Board and the schools senior leadership team on an annual basis. This policy was last reviewed and agreed by the Governing Board and the school’s senior leadership team on 30th July 2021. It is due for review on 30th July 2022.

- IBC Children’s Services is fully committed to the health and welfare of the children and young people in its care. In order to ensure immediate and appropriate responses to the issues of safeguarding and child protection, the home has its own Safeguarding Children Procedures, which are detailed in accordance with the statutory requirements of the Local Safeguarding Children Boards (LSCB). IBC Children’s Services follows the framework for managing allegations of abuse against people who work with children/young people as set out in Working Together to Safeguard Children.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working Together to Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)

All IBC Children’s Services employees must ensure that:

- They are familiar with Part 1 of Keeping Children Safe in Education (2021)
- Children and young people feel safe and that they are listened to.
- They create an environment in which children and young people feel valued.
- Safer recruitment procedures are rigorously followed (please refer to the IBC Children’s Services Safer Recruitment Policy for further details).
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision.

- they are vigilant in monitoring possible signs of abuse including for those children and young people who have complex learning difficulties or specific communication needs.
- they follow the appropriate procedures in place for sharing safeguarding concerns and that these are shared with relevant professionals in a timely manner.
- they understand and implement local safeguarding procedures as set out in local authority arrangements.
- children and young people have opportunity to learn about appropriate relationships with adults and recognise unacceptable behaviour by adults.

[Keeping children safe in education \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

- The school's Safeguarding Children Procedures are available to all staff and form the framework for the reporting and investigation of all allegations. Staff knowledge and understanding of safeguarding policies and procedures are tested during supervision, probationary assessment, and appraisals.
- The school takes seriously its responsibility to safeguard and promote the welfare of all children and young people in its care and any incidents which may undermine the welfare of a child or young person will be dealt with fairly, quickly, and consistently in a way which provides both effective protection for the child or young person and at the same time gives impartial support to the person who is subject to an allegation.
- A full incident report will be logged and in accordance with the school's policies. All details will be recorded in the appropriate dedicated records.
- All staff (including temporary or agency staff) with access to children and young people are made aware of our safeguarding procedures during induction training and their awareness continues to be regularly assessed during on-going supervision and training. In accordance with the requirements of keeping children safe in education 2021 (KCSIE), the home ensures that all staff employed by the organisation receive annual training in safeguarding and child protection.
- All staff are responsible for ensuring that all incidents which present a potential risk of significant harm to a child or young person in our care are reported immediately to the designated person for safeguarding and child protection and the headteacher. The designated safeguarding lead (DSL) or deputy designated safeguarding lead (DDSL) will refer directly to the Local Authority Designated Officer (LADO) and to Local Authority children's social care and the placing authority social worker and this referral will be followed up in writing. The designated safeguarding lead, working together with LADO, will also refer to the police as and when necessary.

- Staff should consult the designated safeguarding lead or the headteacher immediately if they have any concerns in regard to a child's/young person's behaviour towards them.

- Staff should ensure that any visitor to the school is vetted and supervised especially when undertaking work with children or young people. Staff should also ensure that they always know the whereabouts of children and young people and make regular contact with them if they are given free time. Any potential risks to a child or young person (such as exploitation due to vulnerability) must be highlighted in the child or young person's risk assessment. This information should always be disseminated to all staff to ensure that the safety, health and welfare of a child or young person is protected.

- Outcome: Staff are aware of their responsibilities for creating a safe environment for children and young people in the School. While local authorities and placing authorities have statutory responsibilities regarding the safeguarding of children and young people, IBC Children's Services believes that safeguarding is everyone's responsibility. IBC Children's Services expects that staff keep the child or young person at the centre of all that they do and that any actions taken are in the individual's best interest.

2. Legislative Framework and Guidance

This policy for IBC Children Services is derived from a variety of legislative provisions and statutory guidance. It is based on good practice found in:

- Keeping Children Safe in Education (2021).
- Working Together to Safeguard Children (2018).
- Governance Handbook.

Our safeguarding policy and procedures comply with all of this guidance and is updated with local arrangements agreed and published by the three local safeguarding partners. The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory guidance on FGM.
- The Rehabilitation of Offenders Act 1974 outlines provisions for when people with criminal convictions can work with children.
- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- Schools "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory guidance on the Prevent duty. Other statutory provisions relevant to child protection and safeguarding include:
 - The Education Act 2002 (section 175/157).
 - The Education (pupil information) (England) Regulations 2005.
 - Prevent Duty Guidance for England and Wales – September 2015.
 - The Sexual Offences Act, 2003, Home Office.
 - Teaching on-line safety in schools, DfE, 2019.

The duty for all academies, including free schools and all independent schools, to safeguard and promote the welfare of pupils at the school is set down in Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014.

IBC's Children's Services policy reflects these duties and complies with our funding agreement and articles of association.

3. What is safeguarding and child protection?

Safeguarding relates to the action taken to promote the welfare of children and young people to protect them from harm.

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

IBC Children's Services adopts a contextual safeguarding approach to safeguarding and child protection.

Contextual safeguarding is: *"...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts."* (Dr Carlene Firmin)

Child protection is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children and young people who are suffering or are likely to suffer significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children and young people.

At The Mulberry School we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at the heart.

Where there is a safeguarding concern, the child's wishes, and feelings are taken into account when determining what action to take and what services to provide. The systems we have in place are well promoted easily understood and easily accessible for children to confidentiality report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Children's Act 1989 and 2004 respectfully define a child as anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age and is living independently or in further education does not change his or her entitlement to protection under the Children Act 1989.

Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and

others to stay safe (this includes online). The Relationships Education, Relationships and Sex Education and Health Education will cover relevant, topics in an age and stage appropriate way, through a planned, developmental curriculum enabling pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources.

Further information can be found in the DfE guidance “Teaching online safety in school.” And “relationships Education, Relationships and Sex Education and Health Education.”

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

<https://www.gov.uk/government/publications/relationships-education-relationshipsand-sex-education-rse-and-health-education>

4. Safeguarding is everyone’s responsibly.

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, IBC Children’s Services believes that safeguarding is everyone’s responsibility. IBC Children’s Services expects that staff keep the child and young person at the centre of all that they do and that any actions taken are in the best interests of the child. We also expect that children and young people are listened to and their voices are always heard. This is without exception and regardless of whether the child or young person is being cared for in a residential setting, foster home or being educated within school.

As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:

- Is disabled and has specific needs;
- Has special educational needs
- 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;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problem or domestic violence
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect

- Is at risk of being radicalised or exploited
- Is at risk of “honour”-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Has a family member in prison, or is affected by parental offending
- Is persistently absent from education, including persistent absences for part of the school day

Children with special educational needs and disabilities or physical health issues

At The Mulberry School we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition 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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

At The Mulberry School we also recognise that pupils who attend Alternative Provision will often have complex needs and due to this we are aware of the additional risk of harm these children may be vulnerable to.

5. Defining Significant Harm/Child Abuse

“Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of forms, including sexual, physical and emotional abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever form of abuse or neglect, practitioners should put the needs of children first when determining what action to take. (Working together to safeguard children 2018)

The Children Act 1989 introduced the concept of “**significant harm**” as the threshold that justifies compulsory intervention in the family life in the best interests of children. Under section 47 of the act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or is likely to suffer significant harm.

<https://www.legislation.gov.uk/ukpga/1989/41/contents>

Under s31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002:

“Harm” means ill-treatment of the impairment of health or development , including for example, impairment suffered from seeing or hearing the ill-treatment of another; **“Health”** means physical or mental health; and

“ill-treatment” includes sexual abuse and forms of ill-treatment which are not physical. Abuse or neglect is not always easy to identify; staff are more likely to have some information but not the whole picture.

There are four defined categories of child abuse, which are deemed to be forms of “Significant Harm”:

- **Neglect;**
- **Physical Abuse;**
- **Emotional Abuse;**
- **Sexual Abuse**

All staff must be aware of the signs and indicators of child abuse.

<https://www.nspcc.org.uk/what-is-child-abuse/spotting-signs-child-abuse/>

6. Local Arrangements for the school

All staff must be aware of the local arrangements for safeguarding relevant to the school in which they work;

The local arrangements for The Mulberry School are as follows:

Designated Safeguarding Lead for The Mulberry School:

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| Denise Williams (Headteacher) |
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Deputy Designated Safeguarding Leads for The Mulberry School:

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| Fatumo Artan- 0116 4826937 fatumo.artan@ibccs.org |
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If there is a concern or allegation against the headteacher, staff should Nizam Bata for at Nizam.bata@ibchealthcare.co.uk All other concerns against a member of staff should be raised with a member of the designated safeguarding team as named above.

The Mulberry School Safeguarding arrangements are in line with local safeguarding partnership arrangements. The local safeguarding partnership consists of the three safeguarding (the local authority; clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area). The procedures identified in this policy are from Leicester City Local Authorities. For any students that attend the alternate Local Authorities, the safeguarding processes, procedures and guidelines from their respective Local Authorities will be followed.

Concerns about adults who work with children

If you are concerned that an adult who works or volunteers with children has harmed a child, please call the LADO (Local Authority Designated Officer) on **0116 454 2440**.

Alternatively, please email Lado-allegations-referrals@leicester.gov.uk.

For more information on the LADO, visit our [LADO pages](#).

Police Telephone:101. In an emergency always call 999.

Leicester Safeguarding Children Partnership Board Arrangements:

What to do if you are concerned about a child:

If you are concerned about the safety and welfare of a child in **Leicester city**, then please contact Leicester City Council or the Police, on the following telephone numbers.

Children and Young People's Service

Telephone: **0116 454 1004** (open 24/7).

Post: Duty and Advice Service, Halford House, 91 Charles Street, Leicester. LE1 1HL

Members of the public could visit Customer Services at 91 Granby Street, Leicester LE1 6FB where a telephone will be available to contact the Duty and Advice Service, **Children's Social Care**.

A social worker will talk to you about your concerns and will advise of any action required. The service is open 24 hours, 7 days a week, all year.

The service is also the first point of contact for all new referrals to children's services and will deal with anything that relates to city children.

How to make a referral

In the first instance contact **0116 454 1004** to discuss your concerns. You will be advised at this point if you need to complete a **Multi Agency Referral Form (MARF)**. You will be expected to provide the following information (where possible):

- Parents details
- Home address
- Ethnic origin
- Religion
- Details of any other key agencies involved.

You may be asked for more information if there is insufficient to make an assessment. If this is the case it will be because you already have a relationship with the child or deemed to be best placed to get the information.

If a referral is made on behalf of a parent or carer, permission to share their information is required unless doing so would place the child at risk of harm.

The thresholds for access to services for children and families in Leicester are available at www.lcitylscb.org/thresholds. The threshold documents will support you in making the referral.

If you are a professional working with a child and their family, you will be required to provide details of the assessment work you have already undertaken.

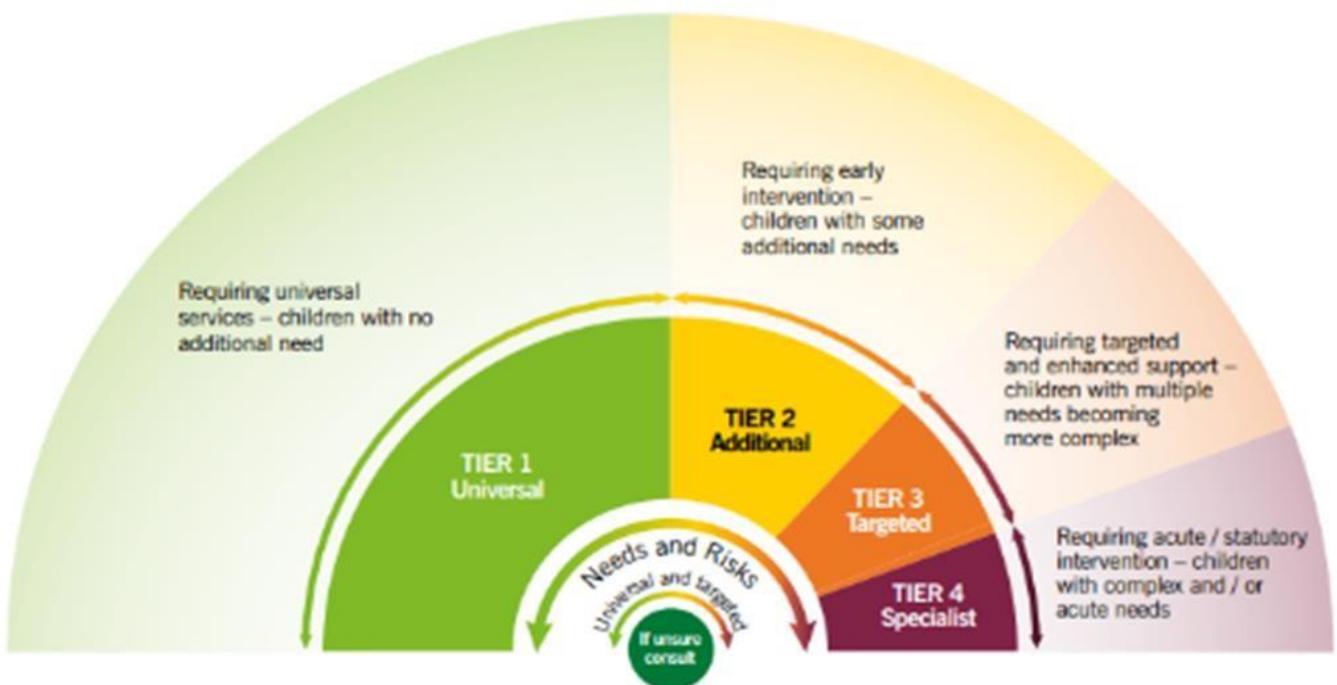
For information checks in relation to children and families

For information checks in relation to children/families (e.g. from the Home Office or Her Majesty’s Prison and Probation Service) contact Children and Young People’s Service on: 0116 454 1004 (phone) or das.team@leicester.gov.uk (e-mail)

Further Support

If you are unable to complete the MARF online, please request a copy of the MARF in an alternative format by contacting the Early Help Queries team on **0116 454 1694** or email early-help-queries@leicester.gov.uk. Please note, alternative formats of the MARF will need to be sent securely to das.team@leicester.gov.uk.

If you are concerned about the safety and welfare of a child in **Leicestershire** or **Rutland**, please visit the [Leicestershire and Rutland website](#) for further information.



If a student lives in a different county to Leicester, that county local authority guidelines should be followed.

7. Roles and Responsibilities

The Designated Safeguarding Lead is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of “Keeping Children Safe in Education 2021”

The Mulberry School has appointed Denise Williams as the Designated Safeguarding Lead for child protection and (in the absence of the designated safeguarding lead) deputy DSL Fatumo Artan will take on the role of DSL. The responsibilities of the designated safeguarding lead include:

- (a) Ensuring that all staff who have direct contact with children or young people are provided with safeguarding and child protection training.
- (b) Promptly notifying the LADO/ Local safeguarding board (LSCB) of all reported concerns.
- (c) Informing all staff of their roles and responsibilities, in recognising and acting upon indicators that a child's or young person's welfare or safety may be at risk and implementing agreed procedures.
- (d) Advising and supporting all staff when they encounter a child protection issue and acting as the first point of contact for all child protection matters.
- (e) Informing the accused person (if the person is a member of staff) about the allegation as soon as possible after consulting the LADO / LSCB. However, if a strategy discussion is needed or it is clear that the police or children's social care may need to be involved, this should not be done until those agencies have been consulted and have agreed what information can be disclosed to the person.
- (f) Attending and contributing to any strategy discussion and any further investigations and suspending a member of staff from duty in cases where the LADO, children's social care and the police consider this to be necessary.
- (g) Ensuring that placing authorities and OFSTED are informed of all child protection incidents and advising and informing the responsible individual of all child protection events.
- (h) Monitoring the child protection case until a conclusion is agreed by all parties and ensuring that accurate written records are kept.
- (i) If the complaint or allegation is about a member of staff and is such that investigation by the police or children's social care is not necessary the designated safeguarding lead will discuss next steps with the LADO. Options may include taking no further action, instigating disciplinary proceedings following investigation or deciding not to use a person's services in future;
- (j) Where a case has been concluded and an allegation against a member of staff has been substantiated, the designated safeguarding lead will discuss with the LADO / LSCB as to whether a referral to the Disclosure and Barring Service is required; The responsible individual will be included in every stage of decision making.
- (k) At the conclusion of a case the designated safeguarding lead will review the circumstances of the case to determine whether there are any improvements to be made to help prevent similar events in the future.

- (l) The designated safeguarding lead will monitor the school's safeguarding and child protection policies and procedures on an annual basis.
- (m) The safeguarding team within the school will understand children's academic progress and attainment and will ensure they maintain a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their full potential.

The responsible individual for the school must maintain oversight of safeguarding matters within the school, provide advice and guidance to the designated safeguarding lead and ensure that the Safeguarding process is followed. **The Responsible Individual must ensure they fulfil their legal responsibility for all safeguarding matters within the school.**

All staff have the following responsibilities:

- (a) To respond in accordance with the school's procedures to every case of alleged abuse or neglect. The school has a trained DSL and a deputy DSL in place. If the headteacher, DSL or Deputy DSL are the subject of an allegation in the first instance staff should raise their concerns to the responsible individual Nizam Bata. If staff have concerns about the responsible individual / Safeguarding Governor, they can refer direct to the local LADO.
- (b) compliance with IBC Children's Services policies, statutory guidance and legislation including Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018);
- (c) understanding the role of the Designated Safeguarding Lead;
- (d) helping to develop and deliver a curriculum which helps children and young people to understand about abuse, appropriate and safe relationships with adults and peers, and keeping safe both online and off line;
- (e) helping to provide an environment where children and young people feel safe and valued;
- (f) attending training and meetings;
- (g) ensuring that they fully understand how to report concerns and if not, asking for further training and support;
- (h) understand the safeguarding response to children who go missing from education;
- (i) listening to children and young people;
- (j) supporting children and young people if they disclose safeguarding information;
- (k) ensuring that they are alert to signs of abuse by peers or adults;
- (l) ensuring that they are aware of indicators or possible signs of neglect;
- (m) ensuring that they closely monitor any possible signs of abuse or harm for those children who are unable to communicate verbally or who have complex health and care needs;
- (n) keeping sensitive information confidential and sharing it only with those professionals for whom it is relevant;

- (o) helping to identify those children or young people who may benefit from Early Help;
- (p) helping to implement Child Protection Plans.

The school will have a central safeguarding tracker to track all allegations, safeguarding concerns, disclosures and whistleblowing. The safeguarding tracker will be shared weekly with the responsible individual and will be discussed and reviewed during the weekly safeguarding meetings.

Responsible Individual: Nizam Bata Email: Nizam.bata@ibchealthcare.co.uk Phone Number: 07894424391

Designated Safeguarding Lead: Denise Williams Email: Denise.williams@ibccs.org

Phone Number:

07852 437925

Deputy Designated Safeguarding Lead: Name: Fatumo Artan Email: Fatumo.Artan@ibccs.org Phone Number: 0116 4826937

8. Whistleblowing

Safeguarding is everyone's responsibility; IBC Children's Services recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns they may have. IBC Children's Services also recognises that children will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

All staff have a duty first and foremost to the children in the school. Any concerns, regardless of how small they may seem, must be reported. The designated safeguarding lead and responsible individual have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and that they feel listened to. It is also important that staff feel supported if concerns are raised about them.

The Whistleblowing Policy outlines the duty all staff have to pass on concerns of child protection, safeguarding and misuse of power. No employee exercising their responsibilities under this procedure and in good faith will be penalised for doing so. Any attempt to victimise employees for raising genuine concerns or to prevent such concerns being raised will be regarded as a disciplinary matter.

If staff do not feel able to raise their concerns following the IBC Children's Services whistleblowing process there is a dedicated whistleblowing helpline, the helpline is provided by the NSPCC.

The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

NSPCC Whistleblowing Advice Line: 0808 800 5000

Email: help@nspcc.org.uk <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicatedhelplines/whistleblowing-advice-line/>

9. Allegations against staff and Volunteers

Allegations that may meet the harms threshold

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in 'Working Together to Safeguard Children' (2018) and 'Keeping Children Safe in Education', DfE (2021) below. An allegation may relate to a person who works / volunteers with children who has:

- ***Behaved in a way that has harmed a child or may have harmed a child***
- ***Possibly committed a criminal offence against or relate to a child***
- ***Behaved towards a child 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.***

The 4th bullet point above recognises circumstances where a member of staff (including supply teachers) or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

At The Mulberry School we recognise our responsibility to report / refer allegations or behaviours of concern and / or harm to children by adults in positions of trust who are not employed by the School to the LADO service directly at Lado-allegationsreferrals@leicester.gov.uk. These are adults such as those in the voluntary sector, taxi drivers, escorts, and fosters carers.

All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that staff maintain a level of professional curiosity. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the designated safeguarding lead.

We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the designated safeguarding lead. The DSL will discuss the content of the allegation with the LADO. Serious urgent matters will necessitate a call to the police and of the local safeguarding board.

If IBC Children's Services removes an individual (paid worker or unpaid volunteer) from work in regulated activity with children (or would have, had the person not left first) because the person poses a risk of harm to children, the organisation or agency must make a referral to the Disclosure and Barring Service to consider whether to add the individual to the barred list. This applies irrespective of whether a referral has been made to local authority children's social care. It is an offence to fail to make a referral without good reason.

The designated safeguarding lead must ensure they follow IBC's Children's Services managing allegations procedure. **For further detail relating to allegations against staff please refer to IBC's Children's Services managing allegations policy.**

Part four of Keeping Children Safe in Education (2021) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff, volunteers or any member of staff employed by a third party working in the school setting. Whilst the individual may not be employed by IBC Children's Services, **schools must ensure** that allegations are managed properly.

KCSIE (2021) states *'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'*

The school has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The School must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first.

When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the school is not their employer, we recognise that we still

have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the school will usually take the lead in conducting an investigation as we have direct access to any affected children and other school staff to collect the facts.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, schools should:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

It is the responsibility of the Designated Safeguarding Lead to ensure that all allegations are managed in line with local safeguarding partnership procedures.

Concerns that do not meet the harm threshold

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. At The Mulberry School we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.

We have a policy which sets out what low level concerns are, the importance of sharing these appropriately, how the setting addresses unprofessional behaviour and supports the individual to correct it at an early stage. This includes when staff should self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

At The Mulberry School we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take

action. This could be through a disciplinary process but also by referring to the LADO Local Authority Designated Officer (based within the Safeguarding Unit).

Telephone Number: 0116 454 2440

Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the LADO service directly.

We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

10. Working with the local authority designated officer (LADO)

In all referrals, the Designated Safeguarding Lead (DSL) is the lead professional within the school for ensuring that a timely response is received from the local authority or LADO. If a response is received which the Designated Safeguarding Lead believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Head Teacher or Governors of the school to agree further action.

11. Safer Recruitment

The IBC Children's Services Safer Recruitment Policy sets the processes which must be followed for the recruitment of staff and volunteers.

At The Mulberry School we recognise that safer recruitment is not just about carrying out the right DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Further information about all of these processes can be found in our Recruitment and Selection policy.

<https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment>

We will ensure that the Headteacher and at least one member of the Governing Body have completed appropriate safer recruitment training. At all times the Headteacher and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*', DfE (2021). At least one person involved in conducting an interview will have received safer recruitment training.

At The Mulberry School we will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities.

We require details of a candidate's present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment, and voluntary work) including reasons for any gaps in employment and evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, and shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

At The Mulberry School we use a range of selection techniques to identify the most suitable person for the post. Structured questions are agreed by the interview panel and any potential areas of concern are explored to determine the applicant's suitability to work with children.

We will undertake Disclosure and Barring Service checks and other pre-employment checks as outlined in *'Keeping Children Safe in Education'* to ensure we are recruiting and selecting the most suitable people to work with our children.

We will maintain a Single Central Register (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements. It is the responsibility of the Headteacher to ensure that the Single Central Record is compliant with legislation and statutory guidance and kept up to date and stored confidentially.

12. Physical Interventions

While the school creates an atmosphere of nurturing, unconditional positive regard and warmth, IBC Children Services recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be used as a last resort.

If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and make an appropriate electronic record. Staff must also verbally inform the Designated Safeguarding Lead/ deputy as well as recording onto the school's electronic recording system ClearCare. Staff must inform their parents or carers.

Allegations of harm relating to physical interventions must be reported to the responsible individual and the safeguarding governor and the Local Authority Designated Officer (LADO).

All staff must read and know the school's individual Physical Intervention Policy.

13. Safeguarding Training and Updates

This policy **must** be read in conjunction with Keeping Children Safe in Education (2021).

All staff are expected to follow this policy and statutory guidance including KCSIE 2021.

This policy is written so as not to replicate information contained within KCSIE part 1 (2021).

All staff must read the following documents:

- Part 1 of KCSIE (2021)
- The school's Restrictive Physical Intervention Policy
- The school's Anti-bullying policy
- The school's low level concerns policy
- IBC's Children's Services Exploitation policy
- IBC's Children's Services Protecting Children from Radicalisation policy
- IBC's Children's Services Harmful Sexual Behaviours policy
- IBC's Children's Services Safer Recruitment policy
- IBC's Children's Services Data Protection policy
- IBC's Children's Services Web Filtering policy
- The school's Whistleblowing and complaints policy
- The school's staff behaviour policy (Code of Conduct)
- DfE guidance on sexual violence and harassment between children in schools and colleges
- DfE guidance on children missing in education
- DfE guidance on Promoting the Education of Looked After Children
- DfE guidance on Teaching Online Safety in Schools

Safeguarding updates **must** be regularly provided to staff, either through face-to-face training, meetings, supervisions or through regular written updates.

Face to face safeguarding training must be provided (and recorded) to all staff at least annually.

Face to face safeguarding workshops will be led by the DSL and these will be scheduled for all staff every three months.

Designated Safeguarding Leads must refresh their advanced training at least every two years.

All members of school leadership teams, including the Headteacher and designated safeguarding lead should also be familiar with Working Together to Safeguard Children 2018.

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Every new member of staff or volunteer will receive safeguarding training during their induction period, all staff will attend a two-week induction before working with children / young people.

The induction programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL).

The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive online safety training as this is part of the overarching safeguarding approach of our school.

14. Partnership working and sharing information

Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.

15. General Data Protection Regulations (GDPR)

All staff must ensure that they comply with the IBC's Children's Services Data Protection Policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to children and young people's personal information, as well as that of staff and parents/ carers.

All staff must complete GDPR training. All staff have a responsibility to ensure that they comply with the GDPR requirements. The IBC Children's Services management team must ensure that they inform young people, parents, and carers of how their personal information will be stored and used.

GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on.

Schools must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. In line with KCSIE (2021) schools must hold more than one set of contact details for pupils.

Data breaches must be reported immediately to the Data Protection Officer as set out in the Data Protection Policy.

IBC's Children's Services Data Protection Officer is: Ayaz Lalani <https://gdpr.eu/what-is-gdpr/>

16. Reporting concerns

What to do if a child or young person discloses

If a child or young person discloses information to member of staff, they must ensure they:

- Listen to the child or young person
- Do not dismiss what the child or young person tells them. All concerns must be acted upon rigorously;
- Do not promise to keep it a secret. They must explain that they have a duty to share information to keep them safe and protect them;
- Write down what the child or young person tells them. This must be accurate and in the child's words;
- Immediately report the concerns to the designated safeguarding lead (DSL), deputy DSL (DDSL) or the headteacher.

Staff must be alert to not just potential familial abuse, but also to children and young people making allegations against staff, volunteers, or peers. All concerns, however small or trivial they may seem, **must** be immediately reported to the designated safeguarding lead. This must be done verbally and then followed up in writing, the member of staff has a responsibility to ensure this written document is completed before they leave the site. All concerns must be recorded on the school's electronic recording system ClearCare.

Any information recorded will be kept in a separate named file, in a secure cabinet and held on the school's electronic system (ClearCare). These files will be the responsibility of the DSL and DDSL. Child protection information will only be shared within school on the basis of "need to know in the child's interests" and on the understanding that it remains strictly confidential

Staff must prioritise the child or young person's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the designated safeguarding lead, they must not share it with anyone else.

On receipt of the information, the Designated Safeguarding Lead must consider all information and then report this within **one working day** to the host authority and or placing authority where relevant. If applicable this information **must** be passed onto the Local Authority Designated Officer (LADO).

Child protection information will be kept up to date. Each concern logged will include:

- A clear comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file. All our safeguarding records will include a chronology, contents front cover and will record significant events in the child's life.

When a child leaves our school, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be done within 5 days of the start of a new term. We recognise that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.

We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recording delivery.

Prior to a child leaving we will consider if it would be appropriate to share any additional information with the new school or college in advance to help them put in place the right support to safeguard this child.

Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns to the services to home educators team Leicester. <https://www.leicester.gov.uk/schools-and-learning/school-andcolleges/education-at-home/>

17. Peer on peer abuse, bullying and Child on child sexual violence and sexual harassment

At The Mulberry School all staff are trained so that they are aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- upskirting;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

We recognise that children are vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers to remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between peers; and that consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) is a form of peer on peer abuse.

We understand, that even if there are no reports in our setting it does not mean it is not happening, it may be the case that it is just not being reported. We recognise that pupils may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct

report, and this may come from a friend or a conversation that is overheard. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to peer on peer abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this 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.

At The Mulberry School all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about peer on peer abuse. The DSL will respond to any concerns related to peer on peer abuse in line with guidance outlined in Part five of '*Keeping Children Safe in Education*' and '[Sexual violence and sexual harassment between children in schools and colleges](#)' (2021). We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

We will work with other agencies including the police and Children's Social Care, as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren).

Anyone who is worried that a child might be presenting with harmful sexual behaviours should refer their concerns to children's social care in accordance with the **Referrals to Children's Social Care Procedure**.

Allegations of harmful sexual behaviour will be taken seriously and discuss the behaviours with the referrer and based on an assessment, decide whether to commence a Single assessment or it is necessary to hold a Strategy meeting (see **Strategy Discussions Procedure**) and pursue a Section 47 enquiry (see **Child Protection Enquiries - Section 47 Children Act 1989 Procedure**).

Following Harmful Sexual Behaviour's being identified the Safeguarding Unit will be notified. Social Care and Early Help will notify the Safeguarding Unit of any child using Harmful Sexual Behaviour, where the assessment indicates inappropriate, problematic, abusive and or violent behaviour. The Safeguarding Unit will offer consultation and overview.

It is recommended throughout the process of referral screening assessment and strategy meetings the following be used:

- The LSCP Threshold Document;

- The combined use of the Brooks Traffic Light Screening tool; • Key Hackett Harmful sexual behaviour continuum indicators.

Separate enquiries and investigations will be pursued in respect of the victim and child presenting harmful sexual behaviours.

Where relevant, assessments will be undertaken in relation to the child or young person presenting harmful sexual behaviours in conjunction with the Youth Offending Service.

A different social worker should be allocated to the victim and to the child or young person with the alleged harmful sexual behaviour even if they live in the same household to ensure that both are supported through the process of the enquiry and that in relation to both children, their needs are fully assessed. It should be recognised that disclosure of problematic or harmful sexual behaviour can be extremely distressing for parents and carers. A child and their family should always be advised of their right to seek legal advice and supported through the process.

The police child abuse investigation unit (CAIU) will always consult with children's social care regarding cases that come to their notice to ensure that there is an assessment of the victim's needs and that in all cases, there is an assessment of the child alleged to be presenting with harmful sexual behaviour. Each child should be referred to the children's social care service responsible for their home address.

Children presenting with harmful sexual behaviour who are returning to the community following a custodial sentence or time in secure accommodation also require consideration through this procedure.

Bullying

Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'; it can even be encouraged and rewarded.

IBC Children's Services has a zero tolerance approach to bullying. All staff have a responsibility to challenge bullying even at a low level.

Staff must help children and young people to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the Designated Safeguarding Lead **on the same day**. The concerns must be documented appropriately.

Schools have a responsibility to ensure that those children and young people who bully, are supported and helped to understand the impact of their actions.

For further information please refer to the school's anti-bullying policy, child protection policy, the Web Filtering policy, and the DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges' December 2017.

For further information refer to the anti-bullying policy. <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/>

18. Exploitation

At The Mulberry School we recognise that Child Sexual Exploitation is a form of child sexual abuse and this imbalance of power coerces, manipulates or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. Child sexual exploitation does not always include physical contact, it can also occur through the use of technology. We understand that some children may not realise they are being exploited e.g they may believe they are in a genuine romantic relationship.

Exploitation of children and young people is a form of child abuse and can include sexual exploitation or criminal exploitation. Schools must write and implement a local exploitation procedure which staff must be familiar with.

All staff **must** know the definitions, signs and indicators of CSE and County Lines. Designated Safeguarding Leads must provide ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.

All staff **must** read IBC's Children's Services Exploitation policy as well as refer to Keeping Children Safe in Education (2021).

Staff **must** report concerns regarding exploitation **immediately** to the Designated Safeguarding Lead. Staff must document their concerns appropriately **on the same day**. Where there are immediate concerns relating to children and young people's safety due to exploitation, Designated Safeguarding Leads must make a same day referral to the local authority and report the concerns to the police as well as to the Responsible Individual.

Where there are low level concerns, Designated Safeguarding Leads must document the concerns on a chronology in order to establish a full picture of what is happening for the child or young person.

It is everyone's responsibility to help children and young people know about grooming and exploitation. Schools must ensure that children and young people know who to talk to if they are concerned about child exploitation.

Sexual Exploitation

Sexual exploitation involves exploitative situations, contexts and relationships where children at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. It affects men as well as women. People who are sexually exploited do not always perceive that they are being exploited. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength, and/or economic or other resources. There is a distinct inequality in the relationship. Signs to look out for are not being able to speak to the child alone, observation of the child seeking approval from the exploiter to respond and the person exploiting the child answering for them and making decisions without consulting them.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

19. Female Genital Mutilation (FGM)

In line with KCSIE (2021), teachers have a legal duty to share concerns regarding FGM, "if a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police".

Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet' as outlined within KCSIE 2021 page 88.

Teaching staff have a legal duty to share concerns with the Designated Safeguarding Lead and to report any concerns. In suspected cases of FGM, staff must refer to the local authority as well as the police. The Designated Safeguarding Lead will assist and support staff with this.

According to the NSPCC, Female Genital Mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons and it can be known as female circumcision, cutting or 'Sunna'.

Sometimes, religious, social or cultural reasons are put forward for this happening but it is abuse and a criminal offence, to a woman or child. The term covers all harmful procedures to the female genitalia for non-medical purposes.

There are four types of FGM and all are illegal and have serious health risks. FGM ranges from pricking or cauterising the genital area, through partial or total removal of the clitoris, cutting the lips (the labia) and narrowing the vaginal opening. FGM is usually performed by someone with no medical training and no anaesthetic or antiseptic treatment is used.

Victims are often forcibly restrained and cutting is made using instruments such as a knife, pair of scissors, scalpel, glass or razor blade and serious health problems are common.

FGM has been a criminal offence in the UK since 1985 and in 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation.

Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. FGM is a hidden crime, and it is therefore difficult to assess the scope of this. More information can be found by contacting help@nspcc.org.uk or calling 0808 800 5000.

Professionals have a legal duty to share concerns regarding FGM with the police.

All staff have a legal duty to share concerns with the designated safeguarding lead and to report any concerns. In suspected cases of FGM, staff must refer to the local authority as well as the police. The designated safeguarding lead will assist and support staff with this.

The designated safeguarding lead must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse including FGM, forced marriage and breast ironing, CSE and Trafficking or Radicalisation are shared **immediately** with the manager and responsible individual. Staff reporting their concerns must ensure they document the concerns on the appropriate document.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilationfgm/>

20. Preventing radicalisation

IBC Children's Services fully recognises its responsibility to have arrangements in place to safeguard and protect children from radicalisation.

Section 26 of the Counter-Terrorism and Security Act 2015 places a statutory responsibility on schools to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the 'Prevent' duty.

All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the designated safeguarding lead, the DSL must assist staff to report all concerns regarding radicalisation to the Police as well as the responsible individual. Staff must document their concerns on the appropriate concerns form.

All staff must be aware of the local procedures relating to reporting radicalisation concerns. Concerns about potential radicalisation should be referred to Local Authority through the usual Safeguarding referral process.

This programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk;
- Assessing the nature and the extent of the risk and
- Developing the most appropriate support plan for the individuals Concerned

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicatedhelplines/protecting-children-from-radicalisation>

21. County Lines Exploitation

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes / schools of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

How does it affect young people and vulnerable adults?

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;

Who is vulnerable to county lines exploitation?

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can take over their homes / schools (known as ‘cuckooing’).

Signs to look out for:

A young person’s involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person’s lifestyle should be discussed with them.

Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls

- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being.

What to do if you are concerned:

Any practitioner working with a vulnerable person who they think may be at risk of county lines exploitation should follow their local safeguarding guidance and share this information with local authority social care services. All staff at IBC Children's Services should be aware of county lines, if staff have concerns, they must ensure they inform the designated safeguarding lead.

The designated safeguarding lead will receive regular updates from the local point of contact at Leicester City Police. Any relevant updates will then be cascaded to the staff team at IBC Children's Services.

We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

22. Domestic Abuse

The Home Office (March 2013) defines domestic abuse as; Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Domestic Abuse includes controlling and coercive behaviour.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

23. Modern Slavery and Human Trafficking

At The Mulberry School we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern Slavery: Statutory Guidance for England and Wales \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/442217/modern-slavery-guidance-2015.pdf) for concerns of this nature.

A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:

- Forced to work through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.

Contemporary slavery takes various forms and affects people of all ages, gender and races. Adults who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults, promised paid work opportunities enslaved and forced to work and live in dehumanised conditions, and adults with a learning difficulty restricted in their movements and threatened to hand over their finances and work for no gains. From 1 November 2015, specified public authorities have a duty to notify the Secretary of State of any individual identified in England and Wales as a suspected victim of slavery or human trafficking, under Section 52 of the Modern Slavery Act 2015.

The main elements of human trafficking are:

- The movement – recruitment, transportation, transfer, harbouring or receipt of people
- The control – threat, use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or benefits to a person in control of the victim
- The purpose – exploitation of a person, which includes prostitution and other sexual exploitation, forced labour, slavery or similar practices, and the removal of organs.

Children cannot give consent to being moved. Therefore, the coercion or deception elements do not have to be present. Countries throughout Europe translate and interpret the Palermo Protocol in different ways so the definition of what constitutes human trafficking can differ between nations.

<https://learning.nspcc.org.uk/child-abuse-and-neglect/child-trafficking-and-modern-slavery>

24. Mate Crime

A “mate crime” as defined by the Safety Net Project is “when vulnerable groups of people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.” Mate crime is often difficult for the police to investigate, due to its sometimes-ambiguous nature, but should be reported to the police who will make a decision about whether or not a criminal offence has been committed. Mate crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

25. Hate Crime

The police define Hate Crime as “any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person’s religion, belief, gender identity or disability”. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence.

26. Children missing from education

All staff must be aware of the risks associated with children who go missing from education, and particularly that very often missing incidents are a warning sign of other safeguarding concerns such as exploitation, forced marriage, FGM, substance misuse or mental health problems. The risk of exploitation and abuse increases for those children and young people who go missing from home and school.

Early identification and intervention is a priority. Schools must have appropriate procedures in place for monitoring the attendance of children and young people in school. Children and young people's attendance must be monitored through Senior Leadership Team Meetings and Governance.

The Head Teacher must ensure that there are two contact numbers on a pupil's file. The Designated Safeguarding Lead must contact the main emergency contact as detailed on the pupil's file should there be concerns regarding the pupil missing education.

Staff must report all unauthorised absences to the Designated Safeguarding Lead. The Designated Safeguarding Lead must make contact with the child or young person's parent/carer immediately to establish the child or young person's whereabouts. The

Designated Safeguarding Lead must inform the placing authority of a pupil's poor attendance.

The Designated Safeguarding Lead is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a child or young person who is missing from education. The Designated Safeguarding Lead **must** refer any safeguarding concerns regarding the absence of a pupil to the local authority. In cases where there are immediate concerns regarding forced marriage or FGM, the Designated Safeguarding Lead must refer to the police immediately. All information **must** be documented appropriately.

Children and young people who are repeatedly missing from education are at particular risk of harm. Attempts must be made to talk to the child or young person about why they are missing from education. Records must be kept of those discussions. Any safeguarding information which the child or young person discloses must be shared **immediately** with the local authority. If the child or young person discloses immediate safeguarding concerns, the Designated Safeguarding Lead must share this information with the police.

27. Children Requiring Support with their Mental Health

IBC Children's Services recognises that schools have an important role in supporting the health and wellbeing of children and young people. Mental ill-health can be an indicator of a child suffering or at risk of abuse, neglect or exploitation. All schools should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support. This will ordinarily be with the consent of the child and their family. All details of concerns and any referrals or other support arranged for the child should be documented on the schools electronic recording system ClearCare.

Schools can refer to the Mental Health and Behaviour in Schools guidance (2018) <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> The guidance provides advice on how to create a whole school culture in promoting positive Mental health outcomes for children and young people.

We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences, can impact their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a child that is also a safeguarding concern, they should take immediate action by passing the information on to a Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.

At The Mulberry School we have a named Mental Health Lead. There are clear systems and processes in place for identifying possible mental health problems and work with other agencies as required to respond to these concerns. Designated Safeguarding Leads make reference to the [Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671112/mental-health-and-behaviour-in-schools-guidance.pdf) DfE guidance for further support.

28. Use of mobile phones and other multi-media devices

Using electronic systems as we do requires the equipment to support that, and so we need to follow the guidelines below to preserve professional standards of practice, Safeguarding and discharging our duty of care in the arena, and of course to meet our responsibilities in regards to GDPR. In line then with policy, this information is designed to offer a very brief overview of some key principles.

- 1) No personal electronic devices are to be used for any IBC Children's Services business unless there is a clear and demonstrable emergency. To use personal devices will be a breach of at least one of the areas mentioned above and often more than one.
- 2) No IBC Children's Services information is to be held on personal devices, including emails and staffing documents.
- 3) Personal electronic devices are not to be visible during working hours, unless with express and written permission from the Headteacher or designated safeguarding person, should a specific need be present.

29. Online safety

IBC Children's Services has a written policy on the acceptable use of its internet and email facilities, which is made clear to staff, children, parents / carers and referring authorities. All staff are aware of, and follow in practice, the policy is to protect staff and children from harm via the world wide web.

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

At The Mulberry School all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered, we will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

More details can be found in our policies on Online Safety and Mobile and Smart Technology which consider the 4Cs, content, contact, conduct and commerce.

At The Mulberry School we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting.

Cybercrime

We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

If there are concerns about a child in this area, the designated safeguarding lead will consider a referral to the [Cyber Choices programme](#) which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyberdependent offences and divert them to a more positive use of their skills and interests.

30. Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse.

Harmful sexual behaviour

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- full penetrative sex with other children or adults.

Children and young people who develop harmful sexual behaviour harm themselves and others. Age differences and harmful sexual behaviour: Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled. If you're not sure whether a sexual behaviour is harmful find out about the signs, symptoms and effects of harmful sexual behaviour.

31. Role of the senior managers and the safeguarding governor

Like teaching staff and volunteers, senior managers and Governors must be safely recruited and have all relevant checks on file. Please see the Safer Recruitment policy for further information.

Governors must have oversight of safeguarding policies and procedures that they are being effectively implemented within the school and that training is effective. In line with KCSIE (2021), which states that; '*Governing bodies and proprietors should have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools or college's safeguarding arrangements*'.

It is the Governors' responsibility to ensure that there is a named Designated Safeguarding Lead and that the school contributes to multi-agency working in line with Working Together to Safeguard Children (2018).

32. Managing Referrals

Managing Referrals to Disclosure and Barring Service, Social Work England, or other professional bodies including the Care Council for Wales (CCW), and/or the Scottish Social Services Council (SSSC), Northern Ireland Social Care Council (NISCC) or Teacher Regulation Authority.

The Responsible Individual and the Safeguarding Governor takes overview of all professional conduct issues to ensure the organisation is compliant and consistent with all legal duties relating to referrals to professional bodies and the Disclosure and Barring Service.

All professional conduct issues which may require a referral to a professional body, whether they relate to safeguarding children or not, must be referred to the Responsible Individual (RI) and Safeguarding Governor. For example, a teacher may be prohibited from teaching for a wide range of reasons which do not relate to the safety of children or young people.

The RI and Safeguarding Governor will support the decision-making process to refer an employee to a professional body / DBS and make it clear who is responsible for the submission of any relevant documentation. This will normally be delegated to a senior manager within the division.

33. Arrangements for Safeguarding and Child Protection during COVID-19

See separate Covid 19 Safeguarding and Child Protection arrangements policy.

34. Use of premises for non-school activities

Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe.

We will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed.) Safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

35. Revision History

To be updated when policy is reviewed, or amendments are made.

21/06/2021- Amendments- contact details updated and named deputy DSL added to policy

30/07/2021- Amendments- to ensure the policy is in line with the updated KCSIE 2021 ready for September 2021

26/01/2022- Amendment made to update change to deputy DSL.

22/02/2022- Amendment made to update change to Headteacher DSL.

15/03/2022-Amendment to Leadership team.

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