



SAFEGUARDING CHILDREN AND YOUNG PEOPLE IN EDUCATION POLICY AND PROCEDURES

POLICY AGREED: SPRING TERM 2021 BY FULL GOVERNING BOARD

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1. Introduction

What is the difference between Safeguarding and Child Protection?

Safeguarding and promoting the welfare of children is defined as:

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

Child Protection is a part of Safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children 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. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

There are six main elements to our policy:

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children.
- Raising awareness of safeguarding children and child protection.
- Equipping children with the skills needed to keep them safe.
- Developing and implementing procedures for identifying and reporting cases, or suspected cases of abuse.
- Supporting pupils who have been abused in accordance with his/her child protection plan.
- Establishing a safe environment in which children can learn and develop.

1.1 School Commitment

The school is committed to creating and maintaining a safe learning environment for children and young people, identifying where there are child welfare concerns and taking action to address them, in partnership with families and other agencies. This policy reflects the policies of Cheshire West's Safeguarding Children Partnership, <http://www.cheshirewestlscb.org.uk/> and is in line with "Working Together to Safeguard Children" (2018) <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> and Keeping Children Safe in Education (2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2020.pdf

The school will also contribute through the curriculum by developing children's understanding, awareness and promoting their resilience by providing a safe environment within schools.

To create this safe environment the school has certain statutory duties and responsibilities set out within:

- The Education Act, 2002, HM Guidance
- Keeping Children Safe in Education, 2020
- Working Together to Safeguard Children, 2018
- The Statutory Framework for the Early Years Foundation Stage

1.2 Duties

To provide a safe environment the Governing Board, Headteacher and the Senior Leadership Team of the school will:

- Ensure that everyone from the Designated Safeguarding Governor to the Designated Safeguarding Lead and all members of the school community have appropriate safeguards and supports in place should they choose to raise safeguarding issues, however unusual or sensitive these may be.
- Cultivate an ethos within the school community where all adults feel comfortable and supported to bring safeguarding issues to the attention of the Headteacher and/or the Designated Safeguarding Lead and are able to pose safeguarding questions with “respectful uncertainty” as part of their shared responsibility to safeguard children.
- Establish and maintain an environment where children feel secure, are encouraged to talk without coercion and are listened to.
- Ensure children know that if they are worried they can talk to adults in the school.
- Ensure that every effort is made to establish effective working relationships with parents and colleagues from other agencies and are fully committed to the provision of Early Help.
- Ensure all adults working with children are aware of the role of Cheshire West’s Safeguarding Children partnership.
- Include opportunities in the Personal, Social and Health Education (PSHE) & Sex and Relationship Education (SRE) curriculum for children to develop the skills they need to recognise and stay safe from abuse and to assess and manage risk (including E-safety) as is appropriate to their age, stage of development and level of understanding.
- Take all reasonable measures to ensure risks of harm to children’s welfare are minimised.
- Take all appropriate action to address concerns about the welfare of a child, working to local policies and procedures in full working partnership with families and agencies as far as possible.
- Ensure robust safeguarding arrangements are in place and embedded in the daily life and practice of the school.
- Promote pupil health and safety.
- Promote safe practice and challenge unsafe practice in line with procedure.
- Ensure that procedures are in place to deal with allegations of abuse against staff and volunteers.
- *HM Government Guidance Keeping Children Safe in Education, 2020, Part 4: Allegations of abuse made against teachers and other staff* (also set out within the Local Interagency Procedures).
- Put in place and promote robust anti-bullying, including cyber bullying, homophobic, transphobic and hate crime, strategies.
- Meet the health needs of children with medical conditions.
- Provide first aid.
- Maximise school security.
- Tackle drugs and substance misuse.
- Provide support and planning for young people in custody and their resettlement back into the community.
- Work with all agencies with regard to missing children, anti-social behaviour/gang activity, child sexual exploitation, radicalisation and extremism, and violence/knife crime in the community.

2. Responsibilities

The school will identify harm and maintain safety by:

- Everybody having a duty to safeguard children inside and outside the school environment including school trips, extended schools, activities and vocational placements.
- Involving parents and providing advice/guidance regarding safeguarding.
- Maintaining a child focus and listening to children.
- Recognising signs of concern, especially with children who may be vulnerable.
- Documenting and collating information on individual children to support early identification, referral and actions to safeguard and by ensuring these records follow the child throughout their educational career.
- Taking appropriate actions to address concerns about a child's welfare in partnership with other organisations and safeguarding agencies.
- Informing all staff and volunteers who the Designated and Deputy Designated Safeguarding Leads for the school are.
- Providing PSHE/SRE including raising awareness with children in what are and are not acceptable behaviours.

PSHE/SRE input will provide opportunities for children and young people to learn how to keep themselves safe, for example, by:

- The availability of advice and support in their local area and online.
- Recognising and managing risks in different situations, including on the internet.
- Judging what kind of physical contact is acceptable and unacceptable.
- Recognising when pressure from others, including people they know, threatens their personal safety and well-being.
- Developing effective ways of resisting pressure.
- Developing healthy relationships, including awareness of unhealthy relationships where domestic violence, bullying and abuse occur.

Our school's arrangements for consulting with and listening to pupils are:

- School Council
- Available staff in each classroom
- Staff across school with relevant training
- Nurture and Wellbeing Lead (not class based) is able to support, advise and complete referrals when necessary.

We make pupils aware of these arrangements by talking to pupils in class and assemblies.

2.1 The roles and responsibilities of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead

An appropriate member of the school's Leadership Team has been assigned to the role of Designated Safeguarding Lead. They have received appropriate training and are supported in their role:

Designated Safeguarding Lead is Judith McGuinness (Headteacher)
Supervised by Rob Pullen (Safeguarding Governor)

A Deputy Designate Safeguarding Lead has been appointed and will provide additional support to ensure the responsibilities for safeguarding children are fully embedded within the school ethos and that specific duties are discharged. This will entail supporting the Designated Safeguarding Lead in dealing with referrals, attending case conferences and supporting the child/children. They have received appropriate training and are supported in their role:

Deputy Designate Safeguarding Lead is Rachel Green (Family Support Worker)
Supervised by Judith McGuinness (Headteacher)

Two other members of staff have been added to the Safeguarding Team at Dee Banks; Jo Williams (Deputy Head) and Ruth Buckley (Nurture & Wellbeing Lead) who both have Level 3 training alongside the Designated and Deputy Designated Safeguarding Leads.

Therefore, the full Safeguarding team at Dee Banks is:

Judith McGuinness (Designated Safeguarding Lead)
Rachel Green (Deputy Designated Safeguarding Lead)
Rob Pullen (Safeguarding Governor)
Jo Williams (Safeguarding Team)
Ruth Buckley (Safeguarding Team)

We acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils. The Designated Safeguarding Lead will ensure a structured procedure within the school, which will be followed in cases of suspected abuse.

The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead are responsible for the following:

2.1.1 Referrals

- Referring cases of suspected abuse or allegations to the relevant investigating agencies.
- The Designated Safeguarding Person is not responsible for dealing with allegations made against members of staff. This is the responsibility of the Headteacher who will inform the Local Authority Designated Officer (DO). The referral form can be found at <https://www.cheshirewestlscb.org.uk/policy-and-procedures/allegations-management-lado/>.
- Acting as a source of support, advice and expertise within the school when deciding on the most appropriate course of action by liaising with relevant agencies.
- Liaising with the Headteacher (where the Designated Safeguarding Lead role is not carried out by the Headteacher) to inform him/her of any issues and ongoing investigations. The Designated Safeguarding Lead will ensure there is always cover for this role on the school site in the event of their absence.
- Ensuring that a systematic means of monitoring children known or thought to be at risk of harm, is in place and that the school contributes to assessments of need and actively supports multi agency planning for those children.

Following any information raising concern, the Designated Safeguarding Lead will consider:

- Any urgent medical needs of the child.
- The immediate safety and wellbeing of the child.
- Discussing the matter with other agencies currently known to be involved with the child and family.

- The child's wishes and feelings.

Then decide:

- Wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- Whether to make a child protection referral to Integrated Access Referral Team (I-ART) because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately.

OR

- Not to make a referral at this stage.
- If further monitoring is necessary.
- If it would be appropriate to invite the parent or carer to engage with a Team Around the Family assessment and/or make a referral for other services.

All information and actions taken, including the reasons for any decisions made, will be fully documented on the child's safeguarding file.

2.1.2 Action following a child protection referral

The Designated Safeguarding Lead or other appropriate member of staff will:

- Make regular contact with the allocated social worker or team manager in the event of absence.
- Wherever possible, contribute to the strategy discussion.
- Provide a report for, attend and contribute to any subsequent child protection conference.
- If the child or children are made the subject of a child protection plan, contribute to the child protection plan and attend core group meetings and review conferences.
- Endeavour to share all reports with parents prior to meetings.
- Where in disagreement with a decision made by Children's Social Care e.g. not to apply child protection procedures or not to convene a child protection conference, follow the formal Escalation Process in respect of resolving professional disagreements/escalation process.
<http://cheshirewestlscb.org.uk/policy-and-practice/escalation-and-resolution-policy/>
- Where a child subject to a child protection plan moves from the school or goes missing, immediately inform i-ART (0300 123 7047).

2.1.2 Raising Awareness

- Working with the Governing Board to ensure that the School's Safeguarding Policy is updated and reviewed annually.
- Ensuring that, in order to avoid conflict and mistrust, parents are aware that referrals may be made and of the role of the School.
- Ensuring that when children leave the school, their Safeguarding/Child Protection File is discussed as soon as possible with the Designated Safeguarding Person at the new school.
- Making sure that the Safeguarding/Child Protection File is transferred separately from the main pupil file within 15 days of transfer. It should be posted recorded delivery to the Designated Safeguarding Lead at the new school or delivered directly by hand and a signature received, unless the child is leaving year 11 and not going to a further education setting, in which case the file should be retained by the current school for a period stipulated in current statutory guidance.

- Where the new school is not known, alerting the Education Welfare Service at Cheshire West and Chester Council so that the child's name can be included on the database for missing pupils and appropriate action taken to ascertain the safety of the child.
- Cascading safeguarding advice and guidance issued by Cheshire West's Safeguarding Children partnership and government guidance and legislation.

2.1.3 Training

The Safeguarding Team need to attend the multi-agency 1-day "Working Together" Level 3 course in Safeguarding provided by Cheshire West's Safeguarding Children Partnership and then the half day Child protection and SMART planning workshop. This training then needs to be updated by attending a half day refresher course, every 2 years, unless anyone on the team feels they require a repeat of the full 1-day course.

This will enable more time to attend additional courses in areas such as Child Exploitation, Neglect and Domestic Abuse.

The Level 3 training will enable the Designated or Deputy Designated Safeguarding Lead to:

- Recognise how to identify signs of abuse and when it is appropriate to make a referral by using the Continuum of Need thresholds.
- Have a working knowledge of how to support the Team Around the Family, how Cheshire West's Safeguarding Children partnership operates, how a child protection case conference is conducted, and be able to attend and contribute effectively to all planning meetings when required to do so.
- Be able to keep detailed, accurate and secure written records of referrals/concerns.

In addition to their formal training, as set out above, their knowledge and skills should be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

The Designated and Deputy Designated Safeguarding Leads will ensure **all** staff receive appropriate Safeguarding training.

All staff will be expected to undergo endorsed Basic Awareness in Safeguarding training within the first term of their employment/placement, which will be refreshed on a regular basis (at least every 3 years), to enable them to understand and fulfil their safeguarding responsibilities effectively.

In addition, all staff members should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff (especially new or part-time staff who may work with different educational settings) and volunteers who work regularly in school, will receive:

- A copy of a Staff Handbook which contains part one of Keeping Children Safe in Education 2020.
- Induction training to ensure that staff have:
 - An overview of the organisation.
 - Understand its purpose, values, services, and structure.
 - Are able to recognise and identify signs of abuse which may include:
 - Significant changes in children's behaviour.

- Deterioration in children’s general well-being.
- Unexplained bruising, marks or signs of possible abuse or neglect.
- Children’s comments which give cause for concern.
- Any reasons to suspect neglect or abuse outside the setting, for example in the child’s home.
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of personal information (e.g. phone numbers, email, social networking) or images.
- Know that they must report any concerns immediately they arise and to whom and are aware of the Whistleblowing Policy and procedures.
- Understand confidentiality issues.

3. Roles and Responsibilities of the Headteacher

The Headteacher will ensure that:

- The policies and procedures adopted by the Governing Board are fully implemented and followed by all staff, so that everyone knows what to do if concerned about a child.
- Enough resources and time are allocated to enable the Designated and Deputy Designated Safeguarding Leads and other staff to discharge their responsibilities, including undertaking the Lead Professional role in the Team Around the Family, taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.
- They personally, along with other senior leaders undertake safer recruitment training to comply with the statutory requirement to have a trained person on every recruitment panel.
- Allegations against a member of staff are referred in a timely manner to the Local Authority Designated Officer (DO) if appropriate.

4. Roles and Responsibilities of the Governing Board

The Governing Board is collectively responsible for the school’s safeguarding arrangements. The Designated Safeguarding Governor will undertake initial Safeguarding training to understand their Role and Responsibilities. Ideally, all Governors will undertake the Basic Awareness Safeguarding training with their school.

Allegations of abuse made against the Headteacher are reported to the Chair of Governors and referred to the Local Authority Designated Officer (DO).

The Governing Board will ensure that:

- Safeguarding arrangements are fully embedded within the school’s ethos and reflected in the school’s day to day safeguarding practices.
- Enough Governors are trained in safer recruitment practices that appointments to the senior leadership team can be adequately supported.
- The school has effective policies and procedures in place in accordance with this policy, and school’s compliance with them is monitored.
- There are policies and procedures in place for dealing with complaints and/or allegations against staff, including the Headteacher and any subsequent staff disciplinary hearings.

- There is a Designated Safeguarding Governor to champion safeguarding issues within the school, to liaise with the Headteacher/Designated Safeguarding Lead, and to provide information and reports to the Governing Board. The Designated Safeguarding Governor should be supported by the Chair of Governors.
- The Headteacher, and all staff who work with children, will undertake a full and endorsed Basic Awareness Safeguarding training regularly (at least every 3 years) and have access to regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.
- The Designated and Deputy Designated Safeguarding Leads attend at least a minimum of Level 3 multi-agency course every two years.
- Temporary staff, volunteers and other regular visitors to the school who work with children are made aware of the school's arrangements for safeguarding and their responsibilities.

5. Identifying Concerns

“Early identification and provision of help is in the child’s best interest and results –services which deliver, and support families are vital in promoting children’s wellbeing.”

“All who come into contact with families have a part to play in identifying these children whose needs are not being adequately met.”

The Munro Review of Child Protection Part 1: A systems analysis Professor Eileen Munro.

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns. If concerns are identified, the child may be spoken to in order to ascertain whether abuse is occurring and may be done without prior consent from the child’s parent/carer because the member of staff has a duty of care under ‘loco parentis’. This would also be the case if the child is a witness to the abuse of another child or children e.g. bullying.

5.1 Definitions, Signs and Symptoms and Types of Abuse

A child as in the Children Act of 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday or in the case of disabled children 25 years.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.

Development means physical, mental, intellectual, emotional, social or behavioural development.

Health includes physical and mental health.

Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse and Neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting,

by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

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

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not the child is aware of what is happening. These activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may include non-contact activities, such as involving children looking at or in the production of, sexual images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Emotional Abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

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

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

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Domestic Abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 and over who are or have been intimate partners or family members regardless of gender and sexuality. This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This includes issues of concern to black and minority ethnic (B&ME) communities such as so called 'honour based' violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

SAFEGUARDING PUPILS/STUDENTS WHO ARE VULNERABLE TO EXTREMISM

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Dee Banks School values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege, it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Dee Banks School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.

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

The school Governors, the Headteacher and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of pupils by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local Safeguarding Children Partnership.

Our school, like all others, is required to identify a Prevent **Single Point of Contact** (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism (this will normally be the Designated Safeguarding Lead). The SPOC for Dee Banks School is the Headteacher Judith McGuinness. The responsibilities of the SPOC are described in Appendix 5.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

SAFEGUARDING PUPILS/STUDENTS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, HONOUR BASED VIOLENCE, FEMALE GENITAL MUTILATION, SEXTING (YOUTH PRODUCED SEXUAL IMAGERY) SEXUAL VOILENCE AND SEXUAL HARRASSMENT OR TRAFFICKING AND MODERN SLAVERY

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections or become pregnant.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.

Child criminal exploitation. As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Some of the following signs may be indicators of criminal exploitation:

- 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.
- Leave 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 wellbeing.

County Lines is a form of criminal exploitation whereby gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs or money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

HBV/Forced Marriage or FGM - So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf.

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

FGM mandatory reporting duty FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Information on when and how to make a report can be found at-

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Forced Marriage i.e. forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGE_NCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmufco.gov.uk.

SEXTING (YOUTH PRODUCED SEXUAL IMAGERY)

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. Many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Yet when young people are asked 'What does 'sexting' mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images.

This only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management.

On this basis current advice introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is to ensure clarity about the issue's current advice addresses.

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

The types of incidents which covered are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.

- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

For the best way to respond to these issues, staff should read the following advice:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

SEXUAL VOILANCE AND SEXUAL HARASSMENT

Sexual violence or sexual harassment can occur between 2 children of any sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The guidance defines the following terms: Sexual Violence, Sexual Harassment and Harmful sexual behaviours.

Sexual violence includes: rape, assault by penetration and sexual assault – intentionally touching another person in a way that is sexual.

Sexual harassment is defined in the guidance as ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

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

* Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. **It is now a criminal offence.**

Harmful sexual behaviours is defined in the guidance as problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children can be considered harmful if 1 of the children is much older, particularly if there is more than 2 years’ difference in age or if one of the children is pre-pubescent and the other is not. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

Children who experience sexual violence and sexual harassment will likely find it stressful and distressing. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys, although it is recognised that sexual violence and harassment can be, and is, perpetrated by girls. Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable.

For the best way to respond to these issues, staff should read the following advice:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

CHILD TRAFFICKING AND MODERN SLAVERY

Child trafficking and modern slavery are forms of child abuse where children are recruited, moved or transported and then exploited, forced to work or sold. Children are trafficked for sexual exploitation, benefit fraud, forced marriage, domestic servitude such as: cleaning, childcare, cooking, forced labour in factories or agriculture and criminal activity such as: pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft.

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.

Trafficked children experience multiple forms of abuse and neglect. Physical, sexual and emotional violence are often used to control victims of trafficking. Children are also likely to be physically and emotionally neglected.

Children are tricked, forced or persuaded to leave their homes. Traffickers use grooming techniques to gain the trust of the child, family or community. They may threaten families, but this isn't always the case, they may promise children education or persuade parents their child can have a better future in another place. Sometimes families will be asked for payment towards the 'service' a trafficker is providing e.g. sorting out travel documentation or transport. Traffickers make a profit from the money a child earns through exploitation, forced labour or crime. Often this is explained as a way for a child to pay off a debt they or their family 'owe' to the traffickers.

Although these are methods used by traffickers, coercion, violence or threats do not need to be proven in cases of child trafficking – a child cannot legally consent, so child trafficking only requires evidence of movement and exploitation.

- Our safeguarding policy, through the school's values, ethos, and behaviour policies, provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.
- Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age-appropriate way in their curriculum.
- Our school works with and engages our families and communities to talk about such issues.
- Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- Our Designated Safeguarding Person knows where to seek and get advice, as necessary.
- Our school brings in experts and uses specialist material to support the work we do.

SAFEGUARDING PUPILS/STUDENTS WHO ARE VICTIMS OF PEER ON PEER ABUSE

There is no clear definition of what peer on peer abuse entails. However, it can be captured in a range of different definitions:

- **Domestic Abuse:** relates to young people aged 16 and 17 who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships;
- **Child Sexual Exploitation:** captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age - including another young person;
- **Harmful Sexual Behaviour:** refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive behaviours);
- **Serious Youth Crime / Violence:** reference to offences (as opposed to relationships / contexts) and captures all those of the most serious in nature including murder, rape and GBH between young people under-18.

Peer on peer abuse can refer to any of the above individually or as a combination, therefore professionals working with children and young people who are experiencing abuse from their peers must respond to the needs of each of the definitions to uncover the level of complexity and respond in the most effective manner. It is possible that a young person may be sexually exploited in a gang related situation by their boyfriend or girlfriend.

Key Areas Where Peer on Peer Abuse Occurs

Bullying (including Cyberbullying)

Bullying is defined as “behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally”. Bullying often starts with trivial events and it is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading hurtful and untruthful rumours, threatening or undermining someone; mocking; making offensive comments; taking belongings; inappropriate touching; producing offensive graffiti; or always leaving someone out of groups. It can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. A child that is being bullied can feel like there's no escape because it can happen wherever they are, at any time of day or night.

There are many different forms of bullying:

- **'Cyberbullying':** involves sending inappropriate or hurtful text messages, emails, or instant messages, posting malicious material online (e.g. on social networking websites) or sending or posting offensive or degrading images and videos.
- **Racist and Religious Bullying:** A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin, or national status.
- **Sexual, Sexist and Transphobic Bullying:** includes any behaviour, whether physical or nonphysical, where sexuality is used as a weapon by boys or girls.
- **Homophobic Bullying:** targets someone because of their sexual orientation (or perceived sexual orientation).
- **Disablist Bullying:** targets a young person solely based on their disability, this can include manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.

It is important to remember that bullying can also be a combination of the above. There has been much media attention surrounding children and young people who have committed suicide due to being bullied. Professionals must understand the damaging and at times fatal effects bullying can and does have on children and young people and be able to respond to it effectively.

Child Sexual Exploitation (CSE)

Many of the warning signs and indicators of CSE tend to refer to adult perpetrators, e.g. associations with older boyfriends / girlfriends, relationships or associations with risky adults and / or entering or leaving vehicles driven by unknown adults. As per the revised definition of CSE it “occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity”. The key element of CSE is the imbalance of power and control within the exploitative relationship. Many children and young people are not aware of the exploitation as they have a genuine belief that they are loved by their boyfriend / girlfriend or are acting in accordance with their peers. Children and young people are often recruited into exploitation by those who they trust, those of a similar age and with similar hobbies, often the nature of peer-on-peer exploitation encompasses a sense of peer pressure and wanting to fit in. In peer-on-peer exploitation, schools and youth clubs are also locations where children and young people can be exploited.

Harmful Sexual Behaviour Including Sexting

Sexually harmful behaviour from young people does not always occur with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour, and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault / abuse. This also includes sexting when someone sends or receives a sexually explicit text, image or video. This includes sending ‘nude pics’, ‘rude pics’ or ‘nude selfies’. Pressuring someone into sending a nude picture may occur in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be committing a criminal offence.

Gang Activity and Youth Violence

A child or young person can be exploited (sexually and / or physically) by a gang, but this is not necessarily the reason why gangs are formed. The Office of the Children’s Commissioner has defined Child Exploitation in gangs and groups as:

- **Gangs** - mainly comprising men and boys aged 13-25 years old, who take part in many forms of criminal activity (e.g. knife crime or robbery) who can engage in violence against other gangs, and who have identifiable markers, for example a territory, a name, or sometimes clothing.
- **Groups** - involves people who come together in person or online for the purpose of setting up, co-ordinating and / or taking part in the sexual exploitation of children in either an organised or opportunistic way. Types of exploitation may include using sex as a weapon between rival gangs, as a form of punishment to fellow gang members and / or a means of gaining status within the hierarchy of the gang. Children and young people may be forced to enter the gang by carrying out an initiation process which may be harmful to them and / or may inflict harm to others. Where abuse takes place in a gang environment, female members may perceive the abuse as normal, as well as accepting it as a way of achieving a respected status / title within the gang.

Domestic Violence

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and / or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and / or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Our school recognises that abuse is abuse and it will never be tolerated or passed off as ‘banter’, ‘just having a laugh’, or ‘part of growing up’. We also recognise that peer on peer abuse, although more likely to be reported by girls as victims and boys as perpetrators, can be experienced by all genders or identities. All reports of abuse will be taken seriously.

5.2 Disclosure

All members of staff, volunteers and governors must know how to respond to a pupil who discloses abuse, and they must be familiar with procedures to be followed.

“Staff across frontline services need appropriate support and training to ensure that as far as possible they put themselves in the place of the child or young person and consider first and foremost how that situation must feel for them. “

Lord Laming 2009

It takes a lot of courage for a child to disclose that they are being abused. They may feel disloyal, ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a pupil talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the pupil may think that you do not want to listen, if you leave it till the very end of the conversation, the pupil may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the pupil:

- Allow them to speak freely.
- Remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the pupil.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil’s mother think about all this. Use TED – **T**ell me about that, **E**xplain that to me, **D**escribe that...
- At an appropriate time tell the pupil that in order to help them you must pass the information on.
- Respect the child’s personal space. Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.

- Tell the pupil what will happen next.
- Report verbally to the Designated Safeguarding Lead.
- Write up your conversation as soon as possible using the school recording process CPOMS.
- Seek support if you feel distressed.
- If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately. Anybody can make a referral.

6. Confidentiality

While it is recognised that all matters relating to safeguarding individual children are confidential, a member of staff, governor or volunteer, if confided in by a pupil, must never guarantee confidentiality to that pupil.

Where there is a Child Protection concern it will be passed immediately to the Designated Safeguarding Lead who will consider the most appropriate response, consulting with relevant partners if appropriate.

The parents of the child should be informed immediately unless it is felt that this would not be in the best interests of the child.

The Headteacher, Designated or Deputy Designated Safeguarding Lead will disclose personal information about a pupil, including the level of involvement of other agencies, to other members of staff only on a 'need to know' basis.

All staff must be aware that they have a duty to share information with other agencies in order to safeguard children as set out in 'Working together to Safeguard Children, 2018' and 'Keeping Children Safe in Education, 2019'.

Practitioners must have due regard to the relevant data protection principles which allow them to share personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

To share information effectively all practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'. Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

7. Records and Monitoring

Child protection information will be stored and handled in line with the principles of the Data Protection Act 2018 and the General Data Protection Regulations to ensure that information is:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes (in this case to meet statutory safeguarding requirements as set out in government legislation).
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate, and where necessary, kept up to date.

- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (Child protection files should be passed on to any new school the child attends and kept until they are 25 (this is 7 years after they reach the school leaving age) (IRMS, 2016).)
- Appropriate security measures are in place to protect the personal data held.
- Take responsibility for what Dee Banks school does with personal data and how Dee Banks school complies with the other principles. Are able to demonstrate compliance through ensuring appropriate measures and records are in place.

Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. This must be done through a Subject Access Request (SAR). This information belongs to the child, who has a right to deny their parent's/carer's access to the file if they wish to do so – further information regarding SARs can be accessed here: What about requests for information about children? <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>. If any member of staff receives a request from a pupil or parent to see safeguarding/child protection records, they should refer the request to the Headteacher.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Any concerns about a child will be recorded in writing within 24 hours. All records must provide a factual, evidence-based account. Accurate recording of actions should be made. Records will be signed, dated and where appropriate witnessed.

Hard copies of records or reports relating to Safeguarding concerns will be kept in a separate, confidential file, securely stored away from the main pupil file. The main pupil file will have (for example, a blue C in the top right-hand corner to denote the existence of a separate file- insert your system) Schools may hold some electronic records, for example, a record of concern log or the multi-agency referral form or a central list of those pupils who have a child protection plan in place. Authorisation to access these electronic records will be controlled by the Designated Safeguarding Lead.

The school will keep written records of concerns about children, even where there is no need to action the matter immediately. These records will be kept within the separate, confidential file.

Records will be kept up to date and reviewed regularly. Original notes will be retained as evidence if there are criminal proceedings arising from current or historical allegations of abuse or neglect or civil actions.

Timely and accurate recording will take place when there are any issues regarding a child. A record of each and every episode/incident/concern/activity regarding that child, including telephone calls to other professionals, needs to be recorded in chronological order and kept within the confidential file for that child. Support and advice will be sought from Children's Social Care, the Local Authority Designated Officer (DO) or other relevant agencies, whenever necessary and recorded.

If the child moves to another setting the Safeguarding file should be sent, electronically or by registered post immediately to the Designated Safeguarding Lead at the new setting, making sure that the Safeguarding file is transferred separately from the main pupil file. There must be liaison between the two Designated Safeguarding Leads in order to ensure a smooth and safe transition for the child.

Where the new school is not known, the Educational Welfare Service and pupil tracking officer at Cheshire West and Chester should be informed so that the child can be included on the data base for missing pupils and action taken to ascertain the safety and wellbeing of the child and that the child is receiving their right to education.

8. Supporting children

“The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children, to the extent it affects their health and development or, at the extreme, causes them significant harm (including self harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti bullying strategies.”

Some children may have an increased risk of harm. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- Disabled or have special educational needs - *staff must consider whether their behaviour, mood and injury may relate to possible abuse and not just their SEN or disability; be aware that they have a higher risk of peer group isolation; there is a possibility of a disproportionate impact of bullying; and they may have difficulties with communication.*
- Children in the care of the Local Authority
- Living in a domestic abuse situation
- Affected by parental substance misuse
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, sexuality or gender identity disorder
- Involved directly or indirectly in child sexual exploitation or child trafficking
- Do not have English as a first language.

Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. The school may be the only stable, secure, and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum.

- A school ethos which promotes a positive, supportive, and secure environment and gives pupils a sense of being valued.
- Implementation of the school Behaviour Policy which is aimed at supporting vulnerable pupils. The school will ensure that the pupil knows that some behaviour is unacceptable, but they are nonetheless valued and are not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the pupil, such as Children's Social Care, Youth Offending service and Education Psychology Service.
- Raising awareness to the school community of Operation Encompass and the school's involvement with Cheshire Police.
- Ensuring that, where a pupil subject to a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

9. Early Intervention and Prevention within Safeguarding

All school staff need to be aware of their responsibility to raise any concerns they have about a child as early as possible in order to prevent the situation worsening. This may present as a change in a child's behaviour, appearance or from a conversation with the family about home conditions, financial difficulties, speech and language, toileting issues etc. Where this concern does not identify a safeguarding issue but could lead to more serious concerns if left, staff need to follow the procedures set out in the **Team around the Family (TAF)** guidance to fulfil their duties at level 2 and 3 on the **Continuum of Need**. This may involve signposting to or involving more appropriate agencies for support and may involve the school acting as Lead Person on a child's TAF. In the event of complex needs, a referral to Integrated access and referral team (**i-ART**) should be made.

Young Carers

In many families, children contribute to family care and well-being as a part of normal family life. A young carer is a child who is responsible for caring on a regular basis for a relative (usually a parent, grandparent, sometimes a sibling or very occasionally a friend) who has an illness or disability. Many young carers may experience:

- Social isolation
- A low level of school attendance
- Some educational difficulties
- Impaired development of their identity and potential
- Low self-esteem
- Emotional and physical neglect
- Conflict between loyalty to their family and their wish to have their own needs met

Where a young carer is identified, the child's needs will be considered using the Team around the Family process.

10. Recruitment

The school pays full regard to DfE guidance 'Keeping Children Safe in Education' 2019. We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult, including volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking

interviews and checking prohibition to teach, Disclosure and Barring checks and right to work in England checks.

In line with statutory changes, underpinned by regulations, the following will apply:

- An enhanced DBS Check is obtained for **all** new appointments where an individual will 'regularly' have contact with our pupils, which will include a barred list/prohibition from teaching check for all new teaching staff.
- This school is committed to keep an up-to-date Single Central Record detailing a range of checks carried out on staff.
- All new appointments to school workforce who have lived outside the UK will be subject to additional checks as appropriate.
- The school ensures that supply staff have undergone the necessary checks and will be made aware of this policy.
- Identity checks must be carried out on all appointments to the school workforce before the appointment is made in partnership with the LA.

11. Volunteers

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, are expected to follow the policies and procedures in the same way *as paid staff*.

Where a parent or other volunteer helps on a one-off basis, he/she will only work under the direct supervision of a member of staff, and at no time have one to one contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period then they will be checked to ensure their suitability to work with children.

We will ensure all volunteers receive guidance on the parameters of their role and what to do if they have concerns before they start their work with the school.

12. Safe Staff

Checks will be undertaken corresponding to Safer Recruitment procedures on all adults working in the school to establish their suitability to work with children.

All school staff will take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted with or in view of other adults.

If an allegation is made against another member of staff, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior teacher if the Headteacher is not present. The Headteacher or most senior teacher will then consult with the Local Authority Designated Officer.

Allegations against the Headteacher are reported to the Chair of Governors and referred to the Local Authority Designated Officer (DO) via the DO referral form.

The Headteacher can be contacted via email at head@deebanks.cheshire.sch.uk
The Chair of Governors can be contacted via email at chair@deebanks.cheshire.sch.uk

13. Conduct of Staff

"Absolutely without fail- challenge poor practice or performance. If you ignore or collude with poor practice it makes it harder to sound the alarm when things go wrong"

"Sounding the Alarm" – Barnardos)

The school has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries.

Staff will have access to Keeping Children Safe in Education 2019 on appointment/induction and have read Part 1 as a minimum.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811515/DRAFT_Keeping_children_safe_in_education_Part_one_2019.pdf

All staff should be aware of the dangers inherent in:

- Working alone with a child.
- Physical interventions.
- Cultural and gender stereotyping.
- Dealing with sensitive information.
- Giving to, and receiving gifts from, children and parents.
- Contacting children through private telephones (including texting), e-mail, MSN, or social networking websites.
- Disclosing personal details inappropriately.
- Meeting pupils outside school hours or school duties.
- Making inappropriate sexual comments; excessive one to one attention beyond the normal requirements of the role; or inappropriate sharing of images.

If any member of staff has reasonable suspicion that a child is suffering harm and fails to act in accordance with this policy and Cheshire West Safeguarding Children Partnership procedures, this will be viewed as misconduct, and appropriate action will be taken.

13.1 Allegations

Where an allegation is made against any person working in or on behalf of the school that he or she has:

- a. Behaved in a way that has harmed, or may have harmed, a child.
- b. Possibly committed a criminal offence against or related to a child.
- c. Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

We will apply the same principles as in the rest of this document and will always follow the Cheshire West Safeguarding Children Partnership Procedures. Detailed records will be made to include decisions, actions taken, and reasons for these. All records will be retained locked away securely in the School Business Manager's office.

Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be with foundation. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

Initial action to be taken:

- The person who has received an allegation or witnessed an event will immediately inform the Headteacher and make a record.
- In the event that an allegation is made against the Headteacher the matter will be reported to the Chair of Governors who will proceed as the Headteacher.
- The Headteacher will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children.
- The Headteacher may need to clarify any information regarding the allegation, however no person will be interviewed at this stage.
- The Headteacher will consult with the Local Authority Designated Officer in order to determine if it is appropriate for the allegation to be dealt with by school or if there needs to be a referral to i-ART and/or the police for investigation.
- Consideration will be given throughout to the support and information needs of pupils, parents and staff.
- The Headteacher will inform the Chair of Governors of any allegation.

If consideration needs to be given to the individuals employment, advice will be sought from Human Resources (Debra Thompson).

[Cheshire West and Chester Council](#)

Tel: 01244 976265

Location: Second Floor, HQ, 58 Nicholas Street, Chester, CH1 2NP

Email: debra.thompson@CheshireWestandChester.gov.uk

14. Supporting staff

It is important not to underestimate the difficulty for both staff and managers in confronting what appear to be poor professional standards or unacceptable conduct by a colleague in an environment, which of necessity is dependent on close working relationships. It must also be recognised that it is very rare for a teacher to commit offences in the manner of Teacher A. However, some of the allegations were of such a serious nature, particularly those from children themselves that they constituted matters that should have been investigated under the child protection procedures.

North Somerset SCR – The Sexual Abuse of Children in a First School February 2012

We recognise that staff working in the school who have become involved with a child who has suffered harm, or who appears likely to suffer harm, may find this situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through anxieties with the Designated Safeguarding Lead or Headteacher and to seek further support, if necessary.

The Designated and Deputy Designated Safeguarding Lead and the Headteacher can seek personal support through scie@cheshirewestandchester.gov.uk.

Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings is available via the Safer Recruitment Consortium website. This guidance provides advice on the boundaries of appropriate behaviour and the circumstances that should be avoided in order to limit complaints against staff of the abuse of trust and/or allegations of abuse.

15. Photographing Children

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. We acknowledge, however, that some people abuse children through taking, using or circulating images.

Staff and Volunteers

- Parental consent will be sought annually at Annual Review Meetings, and permissions noted.
- Staff and volunteers must seek the authorisation of the Headteacher prior to taking photographs/ videos of children and must only use school equipment unless given specific authorisation by the Headteacher.
- The use of cameras on mobile phones or the downloading of images onto any internet site is forbidden.
- Only the pupil's first name will be used with an image.
- It will be ensured that pupils are appropriately dressed before images are taken.
- Pupils are encouraged to tell us if they are worried or unsure about any photographs that are taken of them.

The Guidance for Safer working Practices for Adults who work with Children and Young People provides detailed guidance on the taking of photographs and storage of images.

Parents or Members of the Public

We understand that parents like to take photos of or video record their children in the school production, or at sports day, or school presentations. This is a normal part of family life, and we will not discourage parents from celebrating their child's successes.

However, if there are Health and Safety issues associated with this (e.g. the use of a flash when taking photos could distract or dazzle the child, causing an accident), we will encourage parents to use film or settings on their camera that do not require flash.

We will not allow other people, including staff, to photograph or film pupils during a school activity without parental permission. This includes the use of cameras on mobile phones or any other device.

We will not allow images of pupils to be used on school websites, publicity, or press releases, including social networking sites, without express permission from the parent, and if we do obtain such permission, we will not identify individual children by name.

The school cannot, however, be held accountable for the use of photographs or video footage taken by parents or members of the public at school functions where parental permission has been given.

16. Before and After School Activities and Contracted Services

Where the Governing Board transfers control or otherwise allows the use of school premises to external bodies (such as sports clubs) or service providers during or out of school hours, we will ensure that these bodies or providers have appropriate safeguarding policies and procedures, and that there are arrangements in place to co-ordinate with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the bodies or providers.

Complaints and Compliments

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil, using sarcasm or humiliation as a form of control, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by senior staff e.g. the Headteacher and Governors. An explanation of the complaint's procedure is included in the following policy:



Complaints
Policy-2021.docx

Complaints from staff are dealt with under the school's Complaints, Disciplinary and Grievance procedures.

Additional Information for Parents

Contact arrangements and Parental responsibility

We recognise that a relationship breakdown can be very distressing for all involved, however, any contact arrangements must be agreed outside of school and school should not be put in a position where they are placed in the middle of contact disputes. We aim to make the school environment a calm and safe place for your children, as well as the whole school community, and would be unable to do this if we are placed at the centre of disputes. School is also unable to prevent anyone with parental responsibility (PR) from picking up a child from school unless there is a court order in place stating that the person with PR is not allowed to do so, although the school will attempt to seek permission from the primary carer before releasing the child.

Links to other School policies

This Policy will be read in conjunction with other policies regarding the safety and welfare of children. These together make up the suite of policies to safeguard and promote the welfare of children in this school.

They can be found on the school website and are updated annually/bi annually or when needed.

Code of Conduct

Bullying policy

Intimate Care policy

Attendance Policy

Single Equality Scheme

Acceptable Use Policy

Whistleblowing Policy

Positive Behaviour Support Policy

Medication Policy

E-Safety Policy

Health and Safety Policy

Schools dignity at work policy

Sun Safety Policy

Swimming Policy

Cheshire West Safeguarding Children Partnership's Safeguarding procedures

Safeguarding Children – Key Points

All adults in charge of or in contact with children or young people should know what to do if they suspect that someone is being physically, emotionally, or sexually abused or neglected, or if someone tells them that this is happening. Ensure that you are familiar with the Safeguarding policy; copies of which are located in on Staff Share and the School Website. On request you will be provided with a printed copy.

In addition, the following key points give a guide on what to do and not to do:

1. **Always** stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. Make a note of what was said or observed as soon as possible and pass to the Designated Safeguarding Lead Jude McGuinness at your earliest opportunity.
3. Never make a promise that you will keep what is said confidential or secret. If you are told about abuse you have a responsibility to tell the right people to get something done about it. You should explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell the people who absolutely have to know.
4. Do not ask leading questions that might give your own ideas of what might have happened, e.g. "did he do X to you?" Just ask, "what do you want to tell me?" or "Is there anything else you want to say?"
5. Immediately tell the Designated Senior Lead for safeguarding unless they are the subject of the accusation. Don't tell other adults or young people what you have been told. If someone has made an accusation to you or you have concerns about the Headteacher, you should report your concerns to the Vice Chair of Governors Mrs Julie Henderson, jhenderson@deebanks.cheshire.sch.uk.
6. Discuss with the Designated Senior Lead for safeguarding whether any steps need to be taken to protect the person who has told you about the abuse.
7. **Never** attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc. Children's Social Care and police officers are the people who have the authority to do this. You could cause more damage and endanger possible criminal proceedings. **It is your duty to refer concerns on, not investigate.**
8. As soon as possible (and certainly the same day) the Designated Lead for safeguarding should refer the matter to the Integrated Access and referral team (I-ART) if a child is at risk of or suffering or likely to suffer significant harm. Follow their instructions about what to do next. They will set up any necessary investigations. That is their statutory job. In the case of an allegation against an adult that works with children, the Headteacher, or the Chair of Governors where the allegation is against the Headteacher, should refer the matter to The Local Authority Designated Officer (DO).
9. **Never** think abuse is impossible in your organisation or assume that an accusation against someone you know well, and trust is bound to be wrong.

10. Children and young people often tell other young people, rather than staff or other adults about abuse. Therefore you may hear an allegation from another child. This should be acted upon in exactly the same manner as outlined above.

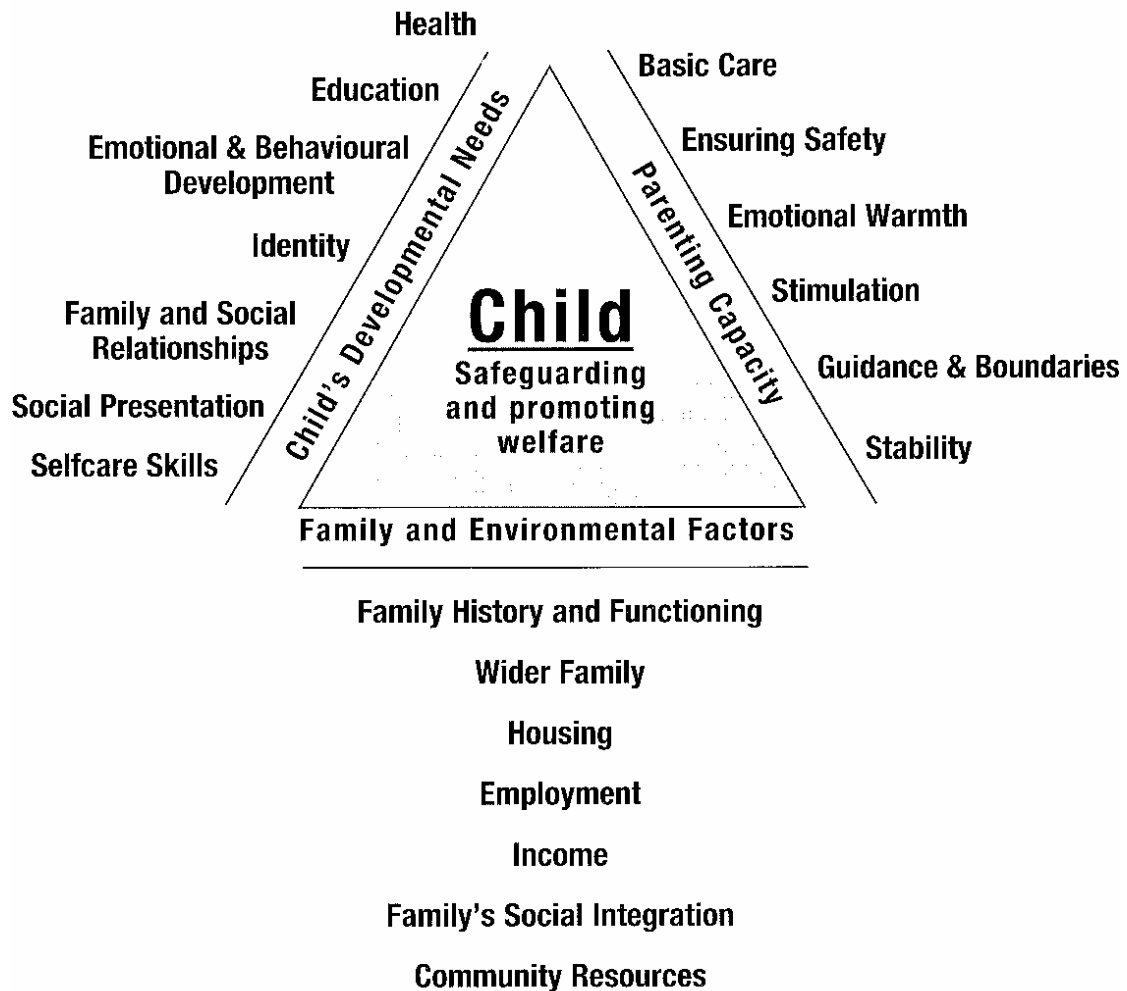
Appendix 2
Essential Contacts

	Contact Details
<i>Designated Senior Person</i>	Judith McGuinness
<i>Headteacher</i>	Judith McGuinness
<i>Nominated Governor for Safeguarding</i>	Rob Pullen
<i>Chair of Governors</i>	TBA
<i>Deputy Designated Person</i>	Rachel Green
<i>Additional trained designated people</i>	Jo Williams Ruth Buckley
<i>Local Authority Designated Officer</i>	Paul Jenkins - https://www.cheshirewestlscb.org.uk/policy-and-procedures/allegations-management-lado/
<i>Local Authority Safeguarding Children in Education Officer</i>	Kerry Gray
<i>Local Authority Legal Services Helpline</i>	01244 972620
<i>Local Authority Human Resources</i>	Debbie Thompson Cheshire West and Chester Council Tel: 01244 976265 Location: Second Floor, HQ, 58 Nicholas Street, Chester, CH1 2NP Email: debra.thompson@CheshireWestandChester.gov.uk
<i>Integrated access and Referral Team</i> 8.30-5pm Mon-Thurs 8.30-4.30 Fri	0300 123 7047
<i>Emergency Duty Team (Out of hours)</i> 4.30pm-8am Mon-Thurs From 4pm Friday 24hours weekends and bank holidays	01244 977 277
<i>TAF Co Ordinator</i>	Hayley Bennett TAF Advisor Integrated Early Support Services Cheshire west and Chester council Tel: 01244 976105 Mobile: 07919228417 Email: Hayley.bennett@cheshirewestandchester.gov.uk Location Blacon Children's Centre, CH1 5DB
<i>TAF Champion</i>	Ruth Buckley / Rachel Green
<i>Safeguarding Children Partnership</i>	www.cheshirewestlsb.org.uk 0151 356 6494
<i>School Health Advisor</i>	Katherine Wagner
<i>CAMHS</i>	Peter Martin / Jenni Butler-Medows

<i>Cheshire Police</i>	0845 458 0000 or 101 for non emergencies 999 in case of emergency
Safer Schools Officer	Amy Fletcher Amy.fletcher@cheshire.pnn.police.uk 01606 364565
Neighbourhood Policing Officer	Anthony Carmon Anthony.carmon@cheshire.pnn.police.uk

Assessment Triangle

Assessment Framework Triangle



Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
 - Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
 - Seek to provoke others to terrorist acts.
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts.
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”, those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
 - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
 - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
 - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
 - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
 - Being in contact with extremist recruiters.
 - Accessing violent extremist websites, especially those with a social networking element.
 - Possessing or accessing violent extremist literature.
 - Using extremist narratives and a global ideology to explain personal disadvantage.
 - Justifying the use of violence to solve societal issues.
 - Joining or seeking to join extremist organisations.
 - Significant changes to appearance and / or behaviour.
 - Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Preventing Violent Extremism - Roles and Responsibilities of the Single Point of Contact (SPOC)

The SPOC for Dee Banks School is Jude McGuinness, who is responsible for:

- Ensuring that staff of the school are aware that you are the SPOC in relation to protecting students/pupils from radicalisation and involvement in terrorism.
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students/pupils from becoming involved in terrorism and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism.
- Raising awareness about the role and responsibilities of Dee Banks School in relation to protecting students/pupils from radicalisation and involvement in terrorism.
- Monitoring the effect in practice of the school's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs.
- Raising awareness within the school about the safeguarding processes relating to protecting students/pupils from radicalisation and involvement in terrorism.
- Acting as the first point of contact within the school for case discussions relating to students / pupils who may be at risk of radicalisation or involved in terrorism.
- Collating relevant information from in relation to referrals of vulnerable students / pupils into the Channel* process.
- attending Channel* meetings as necessary and carrying out any actions as agreed.
- Reporting progress on actions to the Channel* Co-ordinator.
- Sharing any relevant additional information in a timely manner.

* Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by Cheshire West and Chester Local Authority and the Cheshire Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Missing Child Policy and Procedure

The safety of our pupils is of paramount importance. All staff are trained to be aware of safety issues and there is a designated safeguarding officer.

All pupils are handed over into the direct care of the relevant member of staff at the start of the school day via the Front Door. At the end of the day pupils are handed over to the care of their parent/carer or designated support.

In the event of a child going missing the following procedure should be followed:

- The Headteacher, Deputy Headteacher or a member of the Leadership Team should be alerted immediately, and a search undertaken by designated staff while ensuring safety of all remaining pupils.
- Staff, contractors or visitors would be asked not to leave the premises.
- Register to be taken of all pupils
- If the child is not found the parents will be contacted and informed of the situation
- A member of the senior management team will inform the police
- Time, date, location of last sighting of child to be noted.
- On finding a missing child the Headteacher will carry out an investigation into the circumstances of how and why the incident occurred, evaluate and change procedure if necessary, report to parents and governors.