

# St Peter's C.E. Primary School



## Safeguarding and Child Protection Policy

Date adopted by Governing Body: September 2023

Date to be reviewed: September 2024

The school recognises its obligation under Section 175 of the Education Act 2002 to promote and safeguard the welfare of all its pupils and sees its Child Protection and Safeguarding Policy as fulfilling a key part of this duty.

St. Peter's believes that all children, regardless of ethnicity, nationality, religion, culture, family circumstances and ability, have the right to be protected. We believe that every child has the right to be happy, healthy and safe. Safeguarding and promoting the welfare of children is defined as, in accordance with Keeping Children Safe in Education 2023 "protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes"

## References

### Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Keeping Children Safe in Education 2023

### Statutory guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2023) 'Keeping children safe in education 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2019) 'Safeguarding children and protecting professionals in early years'

### Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'

This policy operates in conjunction with the following school policies:

- Children Missing Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child on child Abuse Policy
- Anti-Bullying Policy
- Exclusion Policy
- Online Safety Policy
- Data and Cyber-security Breach Prevention and Management Plan
- Personal Electronic Devices Policy
- Data Protection Policy
- Photography Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy

## **Introduction**

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

St Peter's fully recognises the contribution it makes to safeguarding children.

There are three main elements to our policy:

1. Prevention through teaching, pastoral support and strong and authentic relationships with

pupils and families.

2. Procedures for identifying and reporting cases or suspected cases of abuse. Because of our day-to-day contact with children, school staff are well placed to identify and act upon signs and indications of abuse.
3. Support to pupils who may have been subject to abuse and working with families and additional agencies in order to address and prevent any safeguarding issues and achieve positive outcomes.

Please note that if you are ever concerned about the welfare of a child or family you must contact Social Care on **01744 676600** or the out of hours number on **0845 0500148**.

Our policy applies to everyone in school and is explained to them during induction and re-visited regularly. This applies to all staff and volunteers working in the school, staff and governors. Teaching Assistants, Mid-day Assistants, Office staff, as well as teachers can be the first point of disclosure for a child. Concerned parents, carers or members of the community may also contact school governors, the Headteacher, Deputy Headteacher or Assistant Headteacher if they are concerned about a child. All staff are expected to read Part 1 of the Keeping Children Safe in Education 2023.

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.

DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.

PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

## **Procedures**

St. Peter's follows the procedures set out by the St. Helens Safeguarding Children Board. These are available at [www.sthelensscb.org.uk](http://www.sthelensscb.org.uk) and St. Peter's also has clear internal procedures for dealing with safeguarding issues, these are adopted and followed by all staff members and volunteers.

## **The school will:**

1. Ensure it has three Senior Leads (1 of whom will be the Designated Safeguarding Lead - Mrs Colley) who are all responsible for dealing with safeguarding issues within school. These staff members will have undertaken the training course and this will be refreshed every two years.
2. Recognise the key role of the Designated Senior Lead and arrange all necessary support and training.
3. Receive additional training in order to best support children and their families and achieve positive outcomes regardless of individual circumstance or challenges.
4. Ensure every member of staff and every governor knows the name of the Senior Leads and their roles. They are:

Michelle Colley (Designated Safeguarding Lead)

Tel: 01744 678630 Email: michelle.colley@sthelens.org.uk

Paul Robinson (Deputy Safeguarding Lead)

Tel: 01744 678630 Email: paul.robinson@sthelens.org.uk

Donna Harrison (Qualified Safeguarding Lead)

Tel: 01744 678630 Email: donna.harrison@sthelens.org.uk

Trained for 'Signs of Safety'

Michelle Colley

Paul Robinson

The name of the Governor responsible for safeguarding is: **Mrs Hutton.**

5. Ensure that all members of staff and volunteers are aware of the need to be alert to signs and symptoms of abuse and know how to effectively respond to a child with immediate effect who makes a disclosure. This is offered to them as part of the staff induction. This includes child protection and safeguarding policy, staff code of conduct, part one of 'Keeping Children safe in education', online safety, behavior policy and the safeguarding response to children who go missing from education.
6. Ensure that parent and carers have an understanding of the responsibility placed on the school and staff to safeguard children in accordance with **Keeping Children Safe in Education (September 2023) and Working Together to Safeguard Children (July 2018).**
7. Provide refresher training for all staff every year and a Safeguarding Induction (including issuing the Child Protection and Safeguarding Policy) for new staff and volunteers so that they know:
  - their personal responsibilities,
  - the local policy and procedures,
  - the need to be vigilant in identifying cases of abuse,
  - the appropriate way to take action and support a child who makes a disclosure.
8. Notify the local Social Care team if:
  - There are concerns regarding a child's welfare or safety
  - It should have to exclude a pupil on a Child Protection Plan or who has involvement with social care, either for a fixed term or permanently.
  - There is an unexplained absence of a pupil on a Child Protection Plan or who has involvement with social care.
9. Work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at initial case conferences, core group meetings and child protection review conference (Information Sharing Policy). The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.
10. Keep written records (CPOMS) of concerns about children (noting the date, event and action taken) even when there is no need to refer the matter to Social Care.
11. Ensure that current records are kept secure and in a locked location. All archived files of

children have left the school will be kept securely until they are 25 years old.

12. Adhere to the procedures set out by the St. Helens Safeguarding Children Board and their Safeguarding Procedures when an allegation is made against a member of staff. All allegations will be referred to the **Local Authority Designated Officer (LADO)**. Staff, parents, carers and members of the public may make a referral to the LADO.

**Timba Kanengoni Tel: 01744 671271/01744 671265**

[St. Helens Safeguarding Children Partnership - Families \(sthelenssafeguarding.org.uk\)](http://sthelenssafeguarding.org.uk)

13. Employ robust and secure safer recruitment procedures which are always mindful of protecting children from unsuitable people. Staff trained in 'Safer Recruitment'. Ensure that all our practice is family centered and puts the voice of the child first. Ensure that all staff who are appointed to work in school have an enhanced criminal records search called a DBS check.
14. Ensure that all staff who are appointed to work in school have an enhanced criminal records search called a DBS check. Staff who have been appointed prior to 2002 have a list 99 check. If staff are found to have a criminal record the appointment is reconsidered by the Headteacher and the Governing Body. All appointment panels have at least one member who has undertaken the National College training on Safer Recruitment. New staff are inducted into safeguarding practices. Newly appointed staff are assigned a mentor (DHT or AHT) for the induction period. It is the responsibility of the mentors to familiarise new staff with procedures and policy, which affect the health and safety of all at school but especially the children.
15. Will have a robust system for the induction of volunteers. Volunteers must also have DBS clearance. Visitor may be in and around the school a full DBS search will be conducted. The office performs this

For extended contact with children, when children may be left alone with an adult, or when an adult visitor may be in and around the school a full DBS search will be conducted. The office performs. Visitors who do not yet have clearance will under no circumstance be left alone with a child or group of children.

16. Welcome visitors to St. Peter's and assume that visitors with a professional role i.e. the School Nurse or members of the police already have relevant clearance, the office will endeavour to check this before admittance is granted and a note made of anyone entering without clearance.
17. Encourage children to use the internet as much as possible, but at all times in a safe way. Parents are asked if they agree to their child using the internet. Pupils are never left unattended whilst online. If teachers know of misuse, either by a teacher or child the issue is reported to the Headteacher without delay. We have robust filtering systems to ensure children are not able to access inappropriate material on the internet.
18. Parents are not allowed to photograph and film in school. Parental consent must be obtained to take and display photographs in school.
19. Seek guidance from the Education Safeguarding team.
20. Seek Guidance from the Governing Body.



21. Refer to wider organizations such as Pan Merseyside Protocols – child exploitation. [WSCP-CE-Protocol-January-2021.pdf \(wirralsafeguarding.co.uk\)](#)

## Recruitment

interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

The Governing Body will

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff members have due regard to relevant data protection principles that allow them to share (and withhold) personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a Staff Code of Conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensure all relevant persons are aware of the school's local safeguarding arrangements,

including the governing board itself, the SLT and DSL.

- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS and the where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The Head Teacher will:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, Behavioral Policy, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.

The DSL has a duty to:

- Understand and keep up-to-date with local safeguarding arrangements.
- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Act as the main point of contact with the three safeguarding partners and the child death review partner.
- Contribute to the assessment of children, and/or support other staff to do so.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
  - Ensuring that the school knows which pupils have or had a social worker.
  - Understanding the academic progress and attainment of these pupils.
  - Maintaining a culture of high aspirations for these pupils.
  - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other

- schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
  - Make the necessary child protection referrals to appropriate agencies.
  - Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) [guidance](#).
  - Liaise with the headteacher to inform them of safeguarding issues and ongoing enquiries.
  - Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
  - Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
  - Understand the assessment process for providing early help and intervention.
  - Support staff members in liaising with other agencies and setting up inter-agency assessments where early help is deemed appropriate.
  - Keep cases of early help under constant review and refer them if the situation does not appear to be improving.
  - Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
  - Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
  - Be alert to the specific requirements of children in need, including those with SEND and young carers.
  - Keep detailed, accurate and secure records of concerns and referrals.
  - Secure access to resources and attend any relevant training courses.
  - Encourage a culture of listening to children and taking account of their wishes and feelings.
  - Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
  - Ensure the school's Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
  - Ensure the best educational outcomes by identifying at-risk pupils to the school and its staff, so that the relevant personnel understand each pupil's educational and welfare needs.
  - Support teaching staff to identify the challenges that at-risk pupils may face and the additional academic support and adjustments they can make to support these pupils.
  - Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
  - Ensure that a pupil's child protection file is copied when transferring to a new school.
  - Be available at all times during school hours to discuss any safeguarding concerns. NB. The school will determine what "available" means, e.g. it may be appropriate to be accessible via electronic means, such as on the phone or using video conferencing software.
  - Hold the details of the LA personal advisor and liaise with them as necessary.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales

All staff members have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information, and training provided upon induction

- Be aware of the role and identity of the DSL and deputy DSLs
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Provide a safe environment in which pupils can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Follow the school's procedure for, and approach to, preventing radicalization.
- Challenge senior leaders over any safeguarding concerns, where necessary.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.

Teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

### **Communication and confidentiality**

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that

they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

#### Safer recruitment

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy. An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

Are responsible on a daily basis for the care or supervision of children.

Regularly work in the school at times when children are on the premises.

Regularly come into contact with children under 18 years of age. The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The governing board will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK. The appropriate Disclosure and Barring Service and suitability checks will be carried out for all governors, volunteers, and contractors.

#### Record-keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing using the CPOMs safeguarding recording system.

If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

All safeguarding information is confidential, and records will be held securely and only available to

those appointed to DSL status on CPOMS. Safeguarding records relating to individual children will be archived once a pupil has left the school. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the independent inquiry into Child Sexual Abuse (IIICA), for the term of the inquiry. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will hold a case discussion with the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. The receiving school will sign to state they have received the pupil's records.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within.
- The first 5 days of the start of a new term.

### **Staff suitability**

1. 'All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:
2. Have certain orders or other restrictions placed upon them.
3. Have committed certain offences.'

### **Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

### **Referral to the Disclosure and Barring Service**

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Single central record (SCR)

The school keeps a SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

- The following information is recorded on the Single Central Record:
- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received. If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included. The school is free to record any other information it deems relevant. The details of an individual will be removed from the SCR once they no longer work at the school.



## Types and definitions of abuse

Abuse can take many different forms. St Peter's staff receive training to understand the different forms of abuse and their signs and symptoms.

### Definitions and examples of the different forms of abuse

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be

aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

In relation to 'Keeping Children Safe in Education 2023' and 'Sexual harassment and sexual violence 2018', St Peter's also recognises additional forms of abuse which Children may be at risk of.

These include:

- Domestic abuse
- Homelessness
- Children absent from education
- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Cyber-crime
- Child sexual exploitation (CSE)
- Modern slavery
- FGM
- Virginity testing and hymenoplasty
- Forced marriage
- Radicalisation
- Pupils with family members in prison
- Pupils required to give evidence in court
- Mental health
- Serious violence

## **Prevention**

St. Peter's recognised high self-esteem, supportive friends and positive relationships with trusted adults support prevention and early intervention when it comes to safeguarding children.

All staff, especially the DSL and their deputies, will be aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms).

The school will therefore:

- Establish and maintain a **culture** where children feel secure, encouraged to talk and are listened to;
- Ensure children know that there are adults in school whom they can approach if they are worried or are in difficulty;
- Embed skills throughout school that help children to keep themselves safe. This includes throughout the curriculum, whole school initiatives and bespoke interventions.
- Include in the curriculum, materials which will help children develop a realistic

perspective and appropriate attitude to the responsibilities of adult life and the treatment of children.

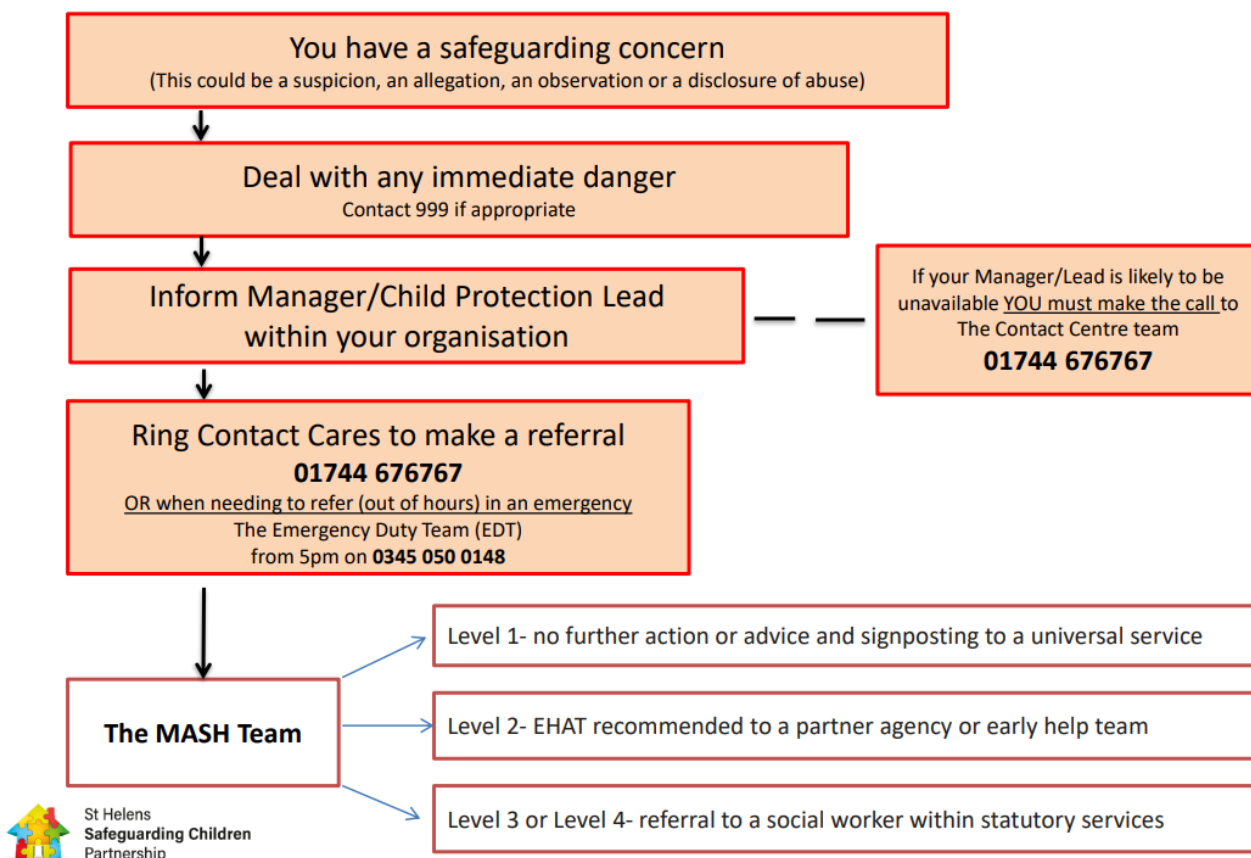
## Recognising abuse and taking action

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

If a child is suffering or likely to suffer harm, or in immediate danger The DSL (or deputy DSL) will make a referral to children’s social care (and/or the police immediately if the child is in immediate danger) If the DSL (or deputy DSL) is not available anyone can make a direct referral, this may be the case if the concern occurs outside of school hours. Tell the DSL as soon as possible if you make a referral directly.

## How to make a referral

### St. Helens process for reporting concerns about children (Under 18)



If it is appropriate to refer the case to the local authority children’s social care, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible. Record the referral using CPOMS or the referrals forms in the staffroom.

The Local Authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded. If the child’s situation does not seem to be

improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

In the absence of the DSL (or deputy DSL) you must always make a direct referral if:

- You believe that a child is in immediate danger you must always contact the Police by dialling 999.
- You believe the child is suffering or likely to suffer harm you must contact the local authority contact centre by telephone 01744 67600 immediately to verbally report your concerns and prevent delay.

A written referral will be completed detailing the contents of the referral as a follow up action.

For further guidance please refer to: [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

**If a child makes a disclosure to you If a child discloses a safeguarding issue to you, you should:**

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

- Verbally inform the DSL and write up your conversation, using the CPOMS recording system as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

- The DSL will triage the concern and decide on the most appropriate action. This may result in a referral being made to children's social care and/or the police directly

- Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

## **Early help**

St. Peter's recognises that early intervention can have a positive impact for our families and can prevent children from significant harm. Therefore St. Peter's promotes an Early Help Offer which is a graduated structure aimed at providing support at the appropriate and earliest level. This is in accordance with St. Helens Council's Continuum of Need

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

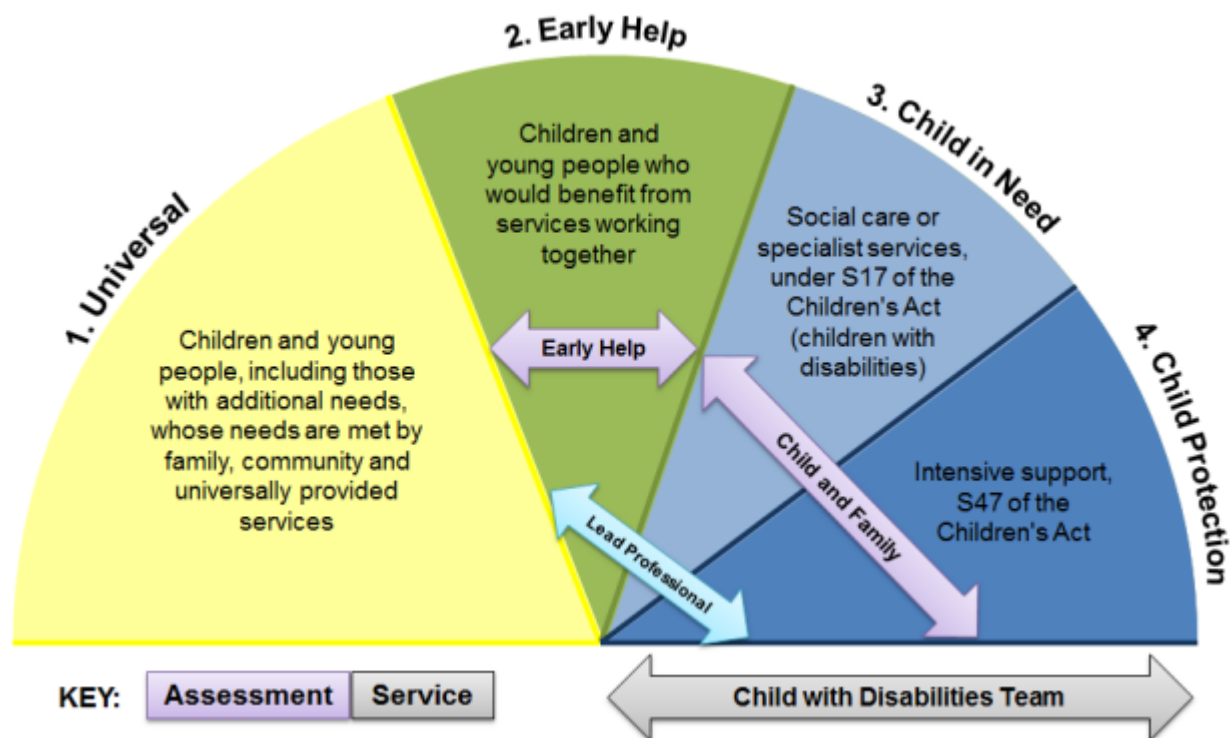
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

**Referral** If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. The local authority will make a decision in one working day of a referral about what course of action to take and will let the person who made the referral know the outcome.

The DSL or person who made the referral must follow up local escalation procedures to ensure their concerns have been addressed and that the children's situation improves using the local authority's safeguarding children partnership board escalation processes. <https://sthelenssafeguarding.org.uk> If you have concerns about extremism If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first so that appropriate referrals can be made as soon as possible and follow the discussion by recording concerns using CPOMS. If in exceptional circumstances the DSL (or the deputy DSL) is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from the Local Authority Children's Social Care. Make a referral to Local Authority Children's Social Care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral and record the referral CPOMS



Supporting the pupil at risk

We recognise that children who are subject to abuse in whatever form may experience a significant effect of their social and emotional wellbeing as well as their academic attainment.

St. Peter's recognises that school is a stable and secure environment in the lives of our pupils, therefore, we strive to create a safe and consistent environment.

In accordance with Working Together to Safeguard Children 2018, St. Peter's recognises that some children may be considered more vulnerable than others.

These include:

- A disabled child and has specific additional needs
- Has special educational needs
- A young carer
- Is showing signs of engaging in anti-social or criminal behaviour
- Is in a family circumstance presenting challenges for the child such as substance abuse, adult mental health, domestic violence, and/or
- Is showing early signs of abuse and/or neglect

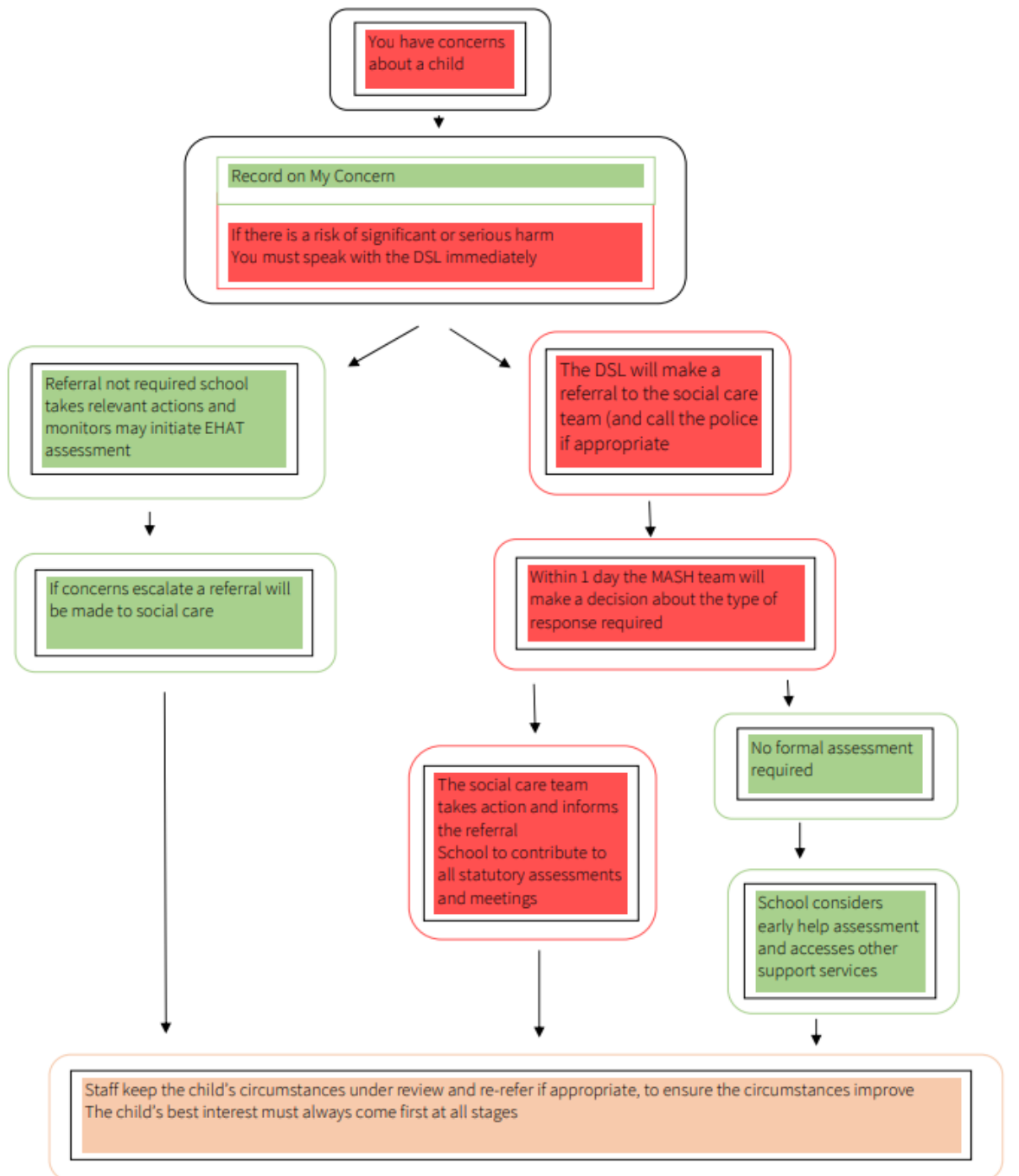
The school will endeavor to support the pupil through:

- The school's behaviour policy is aimed at supporting all pupils in our school especially those who are identified as being vulnerable. All staff will adopt a consistent approach which focuses on the offence committed by the child but does not damage the pupil's sense of self-worth. St. Peter's recognises that all behaviour is a form of communication, and we aim to address any

- underlying issues through pastoral intervention.
- St. Peter’s is committed to working with the appropriate agencies that best support our children and their families.
- St. Peter’s will continue to refer for children who are already open to Social Care and will exercise the St. Helens Local Authority’s escalation policy when deemed necessary.
- When any vulnerable pupil leaves our school, all information will be photocopied and transferred to the new school immediately and Social Care would be informed where necessary.

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

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



## **Concerns about staff members and safeguarding practices**

If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the headteacher.

If the concern is with regards to the headteacher, it will be referred to the chair of governors. Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Any allegations of abuse made against staff members, including those that meet the harms test, will be dealt with in accordance with the school's Allegations of Abuse Against Staff Policy.

For the purpose of this policy, the "harms test" refers to a situation where a person would pose a risk of harm if they continued to work in regular or close contact with pupils in their present position, or in any capacity.

## **Dealing with allegations of abuse against staff**

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the school's Allegations of Abuse Against Staff Policy – a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

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

## **Safeguarding and Attendance**

The Safeguarding Policy links directly to the schools Attendance Policy.

If a child is absent who is deemed to be vulnerable and contact is not made with the school regarding their absence, then the Education Welfare Officer (EWO) or another member of staff may call to the family home to ensure the child's safety.

If a child is absent who is on a Child Protection Plan and contact is not made with the school regarding their absence, then the EWO or another member of staff will inform Children's Social Care.

When a child is continually missing education, St. Peter's will follow Local Authority procedures and will work with the appropriate agencies, including Education Welfare.

St. Peter's CE Primary will always strive to put the correct interventions into place to ensure that



Persistent Absentees improve their attendance. If a pupil goes missing from the school site during the school day, the parent or carer and the Police will be informed immediately; it may also be appropriate to notice Children's Social Care.

Once a child has left the school premises, it is the responsibility of the Police and not staff to try and secure the child. St. Peter's recognises that it may be more dangerous for both staff and the child, if staff were to try and secure the individual.

### **Managing Child on Child Allegations**

For the purposes of this policy, "**child-on-child abuse**" is defined as abuse between children. The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse. All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

## **Online safety and personal electronic devices**

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cyber-security Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Staff will be informed about what filtering and monitoring we have in school and what to do if there is an occurrence when unsuitable monitoring gets through the system.

St Peter's uses, Smoothwall that filters the internet and Apps to ensure unsuitable content cannot be accessed either intentionally or unintendedly. A monitoring system informs the school of any occurrence, and a report is sent to the Head Teacher via email. At the end of the week a summary report is sent to the head teacher. If deemed appropriate the Head teacher / DSL should investigate the blocked items and report any inappropriate breaches of the Smoothwall. Teachers should report any breaches to the DSL and or Head teacher immediately.

## **Communicating with parents**

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use. The school will also make it clear to parents what their children are being asked to do online for school.

## **Reviewing online safety**

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

## **Personal electronic devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff ICT and Electronic Devices Policy and Pupils' Personal Electronic Devices Policy

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **“Operating equipment”** includes enabling, or securing, activation by another person without that person's knowledge, e.g., a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

The 4 key categories of risk: Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example: The safe use of social media, the internet and technology. Keeping personal information private. How to recognise unacceptable behaviour online. How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying and the risks of online radicalisation. All staff members receive refresher training at the beginning of each academic year, and periodically throughout the year through face-to-face training and online training.
- Educate parents/carers about online safety via our website, Facebook Page, communications sent directly to them through our Marvelous Me system and by supporting documentation e.g., information leaflets and safeguarding newsletters. We will also share clear procedures with them so that they know how to raise concerns about online safety.

- St Peter's has a National Online Accreditation

• Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phones and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bag or classroom cupboard during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.
- Pupils' phones will be collected by the class teacher on entry into school and stored in a secure box in the classroom cupboard.

• Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT

systems and use of their mobile and smart technology.

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parent/carers are aware that staff have the power to search pupils' phones, as set out in the DfE guidance on searching, screening, and confiscation.
- Put in robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the school community

### **Context of safeguarding incidents**

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

### **Pupils potentially at greater risk of harm**

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

#### **Pupils who need social workers**

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

#### **Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them. In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll. Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

#### **LAC and PLAC**

Children most commonly become looked after because of abuse and/or neglect. Because of this,

they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

### **Pupils with SEND**

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

### **Pupils with a social worker**

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

### **LGBTQ+ pupils**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any

concerns they have.

### **Pupils requiring mental health support**

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

### **Use of the school premises for non-school activities**

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate.

The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e., a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

### **Extracurricular activities and clubs**

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

### **Alternative provision**

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

### **Private fostering**

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

### **Managing referrals**

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. **Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.**

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

### **Concerns about school safeguarding practices**

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

### **Staff suitability**

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

### **Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

### **Single Central Record (SCR)**

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant. The details of an individual will be removed from the SCR once they no longer work at the school.

### **Training**

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a termly basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education 2023' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.



All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.

Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- Prevent
- LA Safeguarding in schools training
- County Lines
- Operation Encompass
- How to keep LAC and PLAC safe.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role.

St Peter's DSL have the following qualification: *Annual Advanced Certificate in Safeguarding for Designated Safeguarding Leads*.

This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.
- Advanced Certificate in Safer Recruitment for Schools

## **Female Genital Mutilation**

Female Genital Mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It occurs mainly in Africa and to a lesser extent, in the Middle East and Asia; however, children living in the United Kingdom are still at risk of this form of abuse. Although it is believed by many to be a religious issue, it is in fact a cultural practice. There are no health benefits to Female Genital Mutilation. Communities particularly affected by FGM in the UK include girls from: Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan. In the

UK, FGM tends to occur in areas with larger populations of communities who practice FGM, such as first-generation immigrants, refugees and asylum seekers.

Key Points:

- It is NOT a religious practice.
- Occurs mostly to girls aged 5-8 years old; but up to around 15.
- It has been a criminal offence in the United Kingdom since 1985.
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison.

Reasons for this cultural practice include:

- Cultural identity – an initiation into womanhood.
- Gender identity – moving from a girl to a woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – un mutilated women are regarded as unclean.

Risk Factors include:

- Low level integration into UK society
- Mother or sister who has undergone FGM
- Girls who are withdrawn from PSHE
- A visiting female elder from the country of origin
- Being taken on a long holiday to the family's country of origin
- Talk about a 'special' event or procedure to 'become a woman' High Risk Time

This procedure often takes place in the summer, as the recovery period for FGM can be 6 to 9 weeks. Schools should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from school or where the family request an 'authorised absence' for just before or just after the summer school holidays.

Although it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long periods of absence with symptoms of FGM, advice should be sought from the police or social services. It is a mandatory reporting duty under section 5B of the Female Genital Mutilation Act 2003 (as inserted section 74 of the Serious Crime Act 2015) there is a statutory duty upon school staff to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM has been carried out on a girl under 18.

Post FGM symptoms include:

- Difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Unusual behaviour after a lengthy absence
- Reluctant to undergo normal medical examinations
- Asking for help, but may not be explicit about the problem due to embarrassment or fear.

Longer term problems include:

- Difficulties urinating or incontinence
- Frequent or chronic vaginal, pelvic or urinary infections
- Menstrual problems

- Kidney damage and possible failure
- Cysts and abscesses
- Pain when having sex
- Infertility
- Complications during pregnancy and childbirth
- Emotional and mental health problems

FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

### **Forced marriage**

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and

senior mental health lead and referrals will be made on a case-by-case basis.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children’s social care.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely. The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school’s RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

## **Radicalisation**

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

## **The Prevent duty**

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty will form part of the school’s wider safeguarding obligations. The school’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

St. Peter’s work reflects the government **PREVENT** strategy (July 2015) in their approach to radicalisation and extremism. Staff are required to read elements of the prevent strategy relating to school and education. Any concerns regarding radicalisation or extremism in children and young people should be passed onto the school’s **single point of contact** or SPOC. The SPOC will then refer on to the local PREVENT officer, Children’s Social Care and/or the Police.

The PREVENT single point of contact (SPOC) in school is the Designated Senior Lead (**Mrs Colley**)

The PREVENT officer for St. Helens is **John Danher. Tel 0151 777 8383.**

## **Pupils with family members in prison**

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

## **Pupils required to give evidence in court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## **Children absent from education**

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more. The school will follow the DfE's [guidance](#) on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

## **Admissions register**

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance. If a pupil is to be removed from the admissions register, the school will provide the LA with the

following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

### **Channel programme**

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.

In cases where the school believes a pupil is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme. The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

### **Child abduction and community safety incidents**

For the purposes of this policy, "**child abduction**" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers. All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

### **Child Sexual Exploitation (CCE)**

For the purposes of this policy, "**child sexual exploitation**" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

### **Modern slavery**

For the purposes of this policy, "**modern slavery**" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

### **Child criminal exploitation (CCE)**

For the purpose of this policy, "child criminal exploitation" is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

#### Identifying cases

School staff will be aware of the following indicators that a child is the victim of CCE:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part
- Vehicle crime

#### Mental health

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

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

#### Homelessness

The DSL and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to"

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

#### Child abduction and community safety incidents

For the purposes of this policy, "**child abduction**" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers. All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.



Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

## **Sexting**

The school will ensure that staff are aware to treat the sharing of indecent images, including through sexting, as a safeguarding concern.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. Where a member of staff becomes aware of an incidence of sexting that involves indecent images of a pupil, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

Refrain from viewing, copy, printing, sharing, storing or saving the imagery.

- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains without viewing it and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

Where it is necessary to view the imagery, e.g., if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
- Discuss the decision with the headteacher or a member of the SLT.
- Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the SLT.
- Make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the SLT. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the headteacher's office or a member of the SLT's office.
- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the pupil in the images.

- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.

## Up skirting

The school recognises that up skirting is a growing concern amongst professionals and parents and it can expose children to risks. Definition of Up skirting: Up skirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or harm.

The school may become aware of the issue in a variety of ways i.e. from the child direct, a friend of parent or a member of staff. We recognise that the child is likely to be very embarrassed and worried about what might happen. We also recognise the pressure that is on a child can be under to take part in sharing such imagery, but we will reassure them they are not on their own and will help and support them. We will also help them to understand what has happened and the context for the concerns. We will also discuss issues of consent and trust within healthy relationships.

All incidents will be followed in line with our safeguarding and child protection policy. Where an incident comes to our attention:

The incident will be reported to the Designated Safeguarding Lead (DSL) as soon as possible

An initial meeting with the appropriate school staff will be held to:

- Establish if there is immediate risk & what further information is needed, whether or not the imagery has been shared
- Consider facts about the children involved which could influence a risk assessment.
- A meeting with the young person will be held (if appropriate)
- Parents will generally be informed at an early stage

An immediate referral to children's social care and/or the police should be made if at the initial stage:

- The incident involves an adult
- The child has been coerced, blackmailed or groomed or if there are concerns about capacity to consent
- If the sexual acts are unusual for the developmental age or violent
- Children under 13 years are involved
- The child is at immediate risk e.g. suicidal or self-harming

Where the above do not apply then the school will generally deal with this matter without involving the police or children's social care although this will be subject to review.

This decision is made where we are confident that we have sufficient information to assess and manage any risks within our pastoral support and disciplinary framework. The decision will be made by the DSL and others as appropriate and will be recording.

## County lines

For the purposes of this policy, "**county lines**" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Further information on this can be found on:

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

## **Cyber-crime**

For the purposes of this policy, "**cyber-crime**" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

## **Online safety**

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity

The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material

The use of mobile phones by staff and pupils is closely monitored by the school. The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

Where pupils need to learn online from home, the school will support them to do so safely in line with the Pupil Remote Learning Policy and government [guidance](#).

### **Domestic Abuse**

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "**domestic abuse**" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "**Abusive behaviour**" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "**Personally connected**" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise

## Appendix 1:

### Safer recruitment and DBS checks – policy and procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with the children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013, and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on employment of ex-offenders.

Shortlisting Our shortlisting process will involve at least two people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage.

The information we will ask for includes:

- o If they have a criminal history.
- o Whether they are included on the barred list.
- o Whether they are prohibited from teaching.
- o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
- o Any relevant overseas information.
- o Sign a declaration confirming the information they have provided is true.

We will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Seeking references and checking employment

history We obtain references before interview.

Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references.
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher as an accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any issues before the appointment is confirmed. Interview and selection

When interviewing candidates, we will.

- Prove any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made. Pre-appointment vetting checks We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff: The offers of appointment will be conditional until satisfactory completion of the necessary pre-employment check.

The Local Authority Human Resource department is responsible for carrying out the following checks.

- Verifying identity.
- Obtaining (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that a vetting check took place, the result of the check and recruitment decision made.
- Obtaining a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verifying their mental and physical fitness to carry out their work responsibilities.
- Verifying their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verifying their professional qualifications, as appropriate.
- Ensuring they are not subject to a prohibition order if they are employed to be a teacher.
- Carrying out further additional checks, as appropriate, on candidates who have lived or

worked outside of the UK.

Where available, these will include:

For all staff, including teaching positions: criminal records check for overseas applicants  
 For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked. We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought. We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children. activity means a person who will be:

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

Links

[What to do if you're worried a child is being abused](#)

Review Date	Changes made	By whom
December 2018	Inclusion - reference made to child on child sexual violence and sexual harassment. Inclusion - emphasis placed on acting on a concern immediately. Reference made to staff induction Sexting Whistleblowing E-safety Managing Peer on Peer allegations Keeping Children Safe in Education 2019 Working to Safeguard Children 2018 Change in Designated Safeguarding Lead	Mr Robinson
September 2019	Refence - Keeping Children Safe in Education 2019 Inclusion – Refence made to Up skirting in Appendix Inclusion – Reference made to Serious Violent	Mr Robinson

	<p>Crime</p> <p>Inclusion - Reference made in Appendix to DfE Teaching Online Safety in School June 2019</p> <p>Inclusion - Reference made in Appendix to Teaching online safety and harms</p> <p>Reference to Relationships Health and Sex Education - mandatory Sept 2020</p> <p>Reference to Whole School Safeguarding Training up-date</p>	
--	--	--

September 2020	<p>Reference - Keeping Children Safe in Education 2020</p> <p>Inclusion-Reference made to Role of the DSL</p> <p>Inclusion-Reference made to role of the Governing Board</p> <p>Inclusion-Reference made to role of the Head teacher</p> <p>Inclusion-Reference made to the Channel Programme</p> <p>Inclusion-Reference made to homelessness</p> <p>Inclusion-Reference made to Mental Health</p> <p>Inclusion – Remote learning</p> <p>Inclusion - Safeguarding During the Coronavirus (COVID-19) Pandemic</p> <p>Change – Michelle Colley is now DSL</p> <p>Addition of references</p>	Mr Robinson
September 2021	<p>Reference - Keeping Children Safe in Education 2021</p> <p>Inclusion: acronyms</p> <p>Inclusion: HT, Govs, DSL, Staff duties</p> <p>Inclusion: communication, staff suitability</p> <p>Inclusion: types of abuse</p> <p>Inclusion: Mental Health, Child abduction, Modern slavery</p> <p>Inclusion: Cyber crime, Remote Education, Domestic Abuse</p>	Mr Robinson
September 2022	<p>Change of policy reference from peer on peer to child on child</p> <p>Updated Early Help Continuum</p> <p>Addition of Modern slavery paragraph</p> <p>Reference to KCSIE 2022</p> <p>Reference: Governors to have appropriate safeguarding training.</p>	
September 2023	<p>Reference to KCSIE 2023</p> <p>Reference to filtering and monitoring procedures</p> <p>Reference to children absent from education</p> <p>[Updated] Roles and responsibilities</p>	Mrs Colley



	<p>[Updated] Online safety and personal electronic devices</p> <p>[Updated] Pupils potentially at greater risk of harm</p> <p>[Updated] Use of the school premises for non-school activities</p> <p>[Updated] Training</p> <p>[Updated] Specific safeguarding issues</p> <p>Addition of recruitment procedures</p>	
--	--	--