



Pendle Community High School & College
Whole School Policy for Safeguarding & Child Protection

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1. Context and Rationale

Pendle Community High School and College (PCHSC) is a community special school and college for students aged 11-19 years with generic learning difficulties i.e. including moderate to severe and more profound and complex learning difficulties. The majority of students have additional special educational needs (SEN) which can include autism, speech, language and communication needs, physical difficulties and medical needs, visual, hearing and multi-sensory impairments and social, emotional and mental health difficulties.

As a special school we are fully aware that additional barriers can exist when recognising abuse and neglect in this group of children and young people with SEND.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges

Some of our pupils have a social worker under a Child in Need Plan as they have packages of care where there is evidence a child with a disability is in need of specialist SEND support. This is evidenced by the nature of the difficulties that the pupil presents with, as well as the level of care they require to ensure that their needs are identified and met.

This policy applies to all pupils and students on roll. Referral for students who are 18+ will be through the Adult Social Care Safeguarding team.

PCHSC fully recognises the contribution we can make to protect children from harm and to support and promote the welfare of all children who are pupils at our school. This policy applies to all stakeholders; this includes pupils, staff, parents, governors, volunteers, placement students and visitors.

This policy will give clear direction to all stakeholders about expectations and our legal and moral responsibility to safeguard and promote the welfare of all children at our school.

PCHSC is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We recognise that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy sets out a clear and consistent framework for delivering this commitment, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Ensuring that members of the governing body, the Headteacher, staff and all stakeholders understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL. In addition, to ensure that staff are aware that ANYONE can make a referral.

- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children and young people
- Endeavour to provide a safe and welcoming environment where children and young people are respected and valued; where the voice of the child / young person is listened to and is paramount
- Where it is believed that a child is at risk of or is suffering significant harm, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements.
- https://panlancashirescb.proceduresonline.com/chapters/contents.html#ind_cases

2. Summary of all staff actions

All staff including volunteers and supply staff will:

- Report and discuss all safeguarding concerns / disclosures to the DSL / Deputy DSL. Safeguarding concerns / issues relate to anything about a pupil / student's well being
- Record all concerns / disclosures on the school electronic system Onwards and Upwards
- Discuss all concerns including low level concerns about staff to the Headteacher

3. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

The purpose of this safeguarding policy is to ensure every pupil at PCHSC is safe and protected from harm. The Department for Education (DfE) ‘Keeping Children Safe in Education’ (September 2023), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

This policy applies to all pupils and students on roll. Referral for students who are 18+ will be through the Adult Social Care Safeguarding team.

Children can abuse other children. This is generally referred to as **child-on-child abuse** and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. **Sexual harassment can include, but is not limited to:**

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos
 - Sharing unwanted explicit content
 - Upskirting
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including on social media
 - Sexual exploitation, coercion, and threats

Upskirting refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos, colloquially known as “**sexting**” and “**youth produced imagery**”, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. **Indecent imagery** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

4. Law and Guidance

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to:

- **Education Act 2002:** Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies) to have arrangements to safeguard and promote the welfare of children.
- **Working Together to Safeguard Children 2018** guides education establishments of their role within inter-agency working to safeguard and promote the welfare of children. This is the government's statutory guidance for all organisations and agencies who work with, or carry out work related to, children in the United Kingdom.
- **Keeping Children Safe in Education September 2023:** The Department for Education (DfE) has updated the statutory safeguarding and child protection guidance for schools and colleges in England, Keeping Children Safe in Education. This guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18.
- **Guidance for Safer Working Practice 2022**
- **The Children Act 1989 & 2004**
- **The Prevent Duty** – The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 that sets out guidance for the LA and its partners to have due regard to the need to prevent people from being drawn into terrorism.
- **Female Genital Mutilation Act 2003** as inserted by the Serious Crime Act 2015
- **Sexual Offences Act 2003**
- **Equality Act 2010**
- **Counter-Terrorism and Security Act 2015**
- **Domestic Abuse Act 2021**
- **Disqualification under the Childcare Act 2006**
- **PACE code C 2019**
- **Data protection Act 2018**
- **Marriage and Civil Partnership Act 2022**

Relevant Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Governance Handbook'
- DfE (2017) 'Child sexual exploitation'
- DfE (2022) 'Recruit teachers from overseas'
- UKCIS (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2022) 'Working together to improve school attendance'
- **DfE (2022) Behaviour in Schools Advice for Headteachers and school staff July 2022**
- DfE (2022) 'Searching, Screening and Confiscation'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'

This policy operates in conjunction with the following school policies:

- Online safety Policy
- Anti-Bullying Policy
- Positive relationships, behaviour and SEMH Policy
- Promoting positive wellbeing and MH Policy
- School Attendance Policy
- Acceptable Behaviour agreement (devices)
- Use of social networking sites
- Data Protection Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Staff Code of Conduct
- Physical Contact Policy
- Child on Child Abuse Policy (child friendly)

5. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil with a **child-centred approach**
- Contribute to, and maintain a **high safeguarding ethos** within the setting, with safeguarding pupils at the forefront of practice at all times
- Ensure ALL children have opportunities to communicate and know that they are **listened to**
- Contribute to **providing a curriculum** which will equip children with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential
- Establish effective, supportive, and **positive relationships** with parents, carers, pupils and other professionals
- Maintain an attitude of **'it could happen here'** where safeguarding is concerned
- Be proactive to provide a **safe and secure environment** in which pupils can learn
- Be prepared to **identify** pupils or families who may benefit from **early help**
- Be aware of the **school's individual procedures** that support safeguarding, including all policies, internal reporting procedures, information and engage with training provided
- Be aware of the role and **identity of the DSL** and deputy DSLs and seek them for advice
- Undertake **safeguarding training**, including online safety training, during induction and subsequently on a regular basis (at least annually), including receiving bulletins, emails and briefings. Staff should undertake **Prevent awareness training** at least bi-annually
- Be aware of the **local early help process** and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care, understanding that **anyone can make a referral**
- Understand how to make a referral to CSC 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, exploited or neglected, in a timely manner
- Maintain appropriate **levels of confidentiality** when dealing with individual cases
- **Reassure victims** that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Be aware of **safeguarding issues** that can put pupils at risk of harm.
- **Be aware of behaviours linked to issues** such as drug-taking, alcohol misuse, deliberately missing education, sharing indecent images, extremist behaviours and other signs that pupils may be at risk of harm

- Be fully aware of the importance of **mental health in relation to safeguarding** and that all staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Be aware that a **pupil may not feel ready** or know how or have the communication skills to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Understand the process for reporting **concerns over professional adults**.

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'**.
- Report, by law, any disclosures of FGM to the police.

The governing body has a duty to:

- Take **strategic leadership responsibility** for the school's safeguarding arrangements
- Ensure that the school **complies with its duties** under the above child protection and safeguarding legislation
- Ensure that all governors receive **appropriate safeguarding and child protection training** upon their induction and that this training is updated regularly
- Ensure that staff **read, understand and follow** part one and Annex B of KCSIE September 2023.
- Ensure a **named Governor takes leadership responsibility** for safeguarding arrangements and receives appropriate training in the management of safeguarding
- Attend **Prevent training** at least bi-annually
- Appoint an appropriate member of staff from the SLT to **the role of DSL** and one or more deputy DSLs to provide support and ensure that they are trained to the same standard as the DSL ensuring that the roles are explicit in their job description(s). Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role
- Support and monitor a **whole-school approach to safeguarding**; this includes ensuring that safeguarding and child protection are at the forefront and **ethos** remains consistently high
- Ensure **systems are in place so that children are helped to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the child** is heard and acted upon.
- Ensure **effective and appropriate policies** and procedures are in place
- 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
- 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
- Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training**
- Ensure that **all staff receive relevant safeguarding and child protection training** updates, e.g. emails, as required, but at least annually, including a thorough induction
- Confirm that there are transparent procedures in place to handle **allegations against staff**, supply staff, volunteers and contractors

- Confirm that there are **procedures in place to make a referral to the DBS** and the Teaching Regulation Agency (TRA), 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
- 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 child-on-child abuse.
- Appoint a **designated teacher to promote the educational achievement of CLA** (Children who are Looked After) and ensure that this person has undergone appropriate training
- Ensure that the **appropriate level of check** is completed on Governors
- Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns
- Understand that online safeguarding is an interrelated and running theme through safeguarding practice. Ensure that **children are safe online** by ensuring that **appropriate filters and monitoring systems are in place** and regularly review their effectiveness, understanding those children that are potentially at greater risk of harm, along with the proportionality of costs versus safeguarding risks. (see online safety policy 2023)
- 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 escalation in the future.
- Ensure that **safeguarding is embedded within the curriculum**
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child-on-child abuse** and safeguarding children with disabilities and special educational needs
- Complete the **S175/175 audit tool** on a bi-annual basis (at least) as directed by the Local Authority
- Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a **wholly child centred approach**.

The DSL has a duty to:

- Take **lead responsibility for safeguarding** and child protection, (including online safety and understanding the filtering and monitoring systems and processes in place, ensuring their effectiveness) whilst creating a culture of safeguarding throughout the setting, continually raising the profile.
- Provide **advice, support and expertise to other staff** on child welfare, safeguarding and child protection matters
- **Take part in strategy discussions**, inter-agency meetings and Child Protection Conferences and/or support other staff to do so.
- **Contribute to the** assessment of children, and/or support other staff to do so
- Ensure that all staff receive **appropriate safeguarding training**
- **Be available** during school hours for staff to discuss any safeguarding concerns
- Arrange, alongside the school, adequate and **appropriate cover** for any activities outside of school hours or terms.
- Refer cases:
 - To CSC where abuse and neglect are suspected, and support staff who make referrals CSC
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme

- To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child
- To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance
- And to any other appropriate identified agency or partner
- Act as a **point of contact** with the multi-agency partners
- Ensure **effective communication** and information sharing (when appropriate) between Deputy DSL's / SLT/ Governors / Head teacher.
- Liaise with staff when deciding whether to make a referral by **liaising with relevant agencies** so that children's needs are considered holistically
- 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 relevant staff, **taking lead responsibility for promoting educational outcomes** for children, by understanding the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, knowing the 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
- Ensure that **child protection files are kept updated** and secure, monitoring the quality and accuracy of logs
- Ensure that a pupil's child protection **file is transferred** as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared to support a child's journey
- Ensure **all stakeholders understand the Child Protection Policy**, Keeping Children Safe in Education 2023 and internal procedures to report any concerns, are transparent and understood by all. Ensure this information is given in **induction** and at regular intervals/ training
- Work with the governing body to ensure the school's **Child Protection and Safeguarding Policy is reviewed at least annually**, and the procedures are updated and reviewed regularly
- Ensure the school's **Child Protection and Safeguarding Policy is available publicly**, ensure that parents are aware of schools' responsibilities regarding safeguarding and child protection
- Undergo **DSL training**, and update this training at least every two years to remain compliant
- Ensure opportunities for **further training** and opportunities for upskilling are taken
- Have due regard to the **PACE Code C 2019** in regards to the role of an appropriate adult
- Encourage a culture of listening to children promoting **the voice of the child**
- **Recognise the importance of information sharing**, including within school, with other schools and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR
- Undertake **Prevent** awareness training (at least) bi-annually
- Be provided with appropriate support and **supervision** in order to carry out the role safely and effectively
- Liaise with the Local Authority Personal Advisors for any Care Leavers.
- Have due regard to Appendix C of Keeping Children Safe in Education 2022 – 'The Role of the Designated Safeguarding Lead'
- Ensure that the school has suitably trained Key Adult /s in order to fulfil its obligations under Operation Encompass.

- Ensure that the school's commitment to Operation Encompass is known throughout the school community via the means of staff training, parental letters, posters, and the school website.
- **The designated teacher** has a responsibility for promoting the educational achievement of CLA and previously CLA (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. In our setting, this is Claire Endersby, Assistant Headteacher.

PCHSC recognises that Deputy DSLs must be trained to the same standard as the DSL.

6. Training and Induction

PCHSC recognises the importance of ongoing staff training and development to keep staff aware of emerging issues and keeping the ethos and culture of safeguarding at the forefront. Everybody has a role to play in safeguarding our children and we strive to ensure all staff are well informed and know what to do if they have any concerns. Staff members, governors and volunteers will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

PCHSC induction training includes:

- The Child Protection and Safeguarding policy
- Online safety policy
- The Staff Code of Conduct
- Part one of 'Keeping children safe in education' (KCSIE) and Annex B (or Annex A, if appropriate).
- The positive relationships, behaviour and SEMH policy.
- Guidance for Safer Working Practice Feb 2022
- The Attendance policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Promoting positive wellbeing and mental Health policy.
- Information about the role and identity of the DSL and deputy DSL(s)
- How to record concerns.
- Attachment and trauma training

Following induction, PCHSC recognises the need to ensure continual, effective training to staff and other stakeholders.

We will ensure: -

- ALL staff, Governors and volunteers will receive Safeguarding Training (at least) annually
- The DSL/s will provide ALL staff, volunteers and governors with regular safeguarding updates
- ALL staff, volunteers and governors will read and show an understanding of any updates that are provided
- DSLs will attend DSL training every 2 years and update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis
- The DSL, along with Governors and all staff will undertake Prevent awareness training (at least) every two years
- Relevant staff and governors will attend / refresh Safer Recruitment Training every 5 years
- ALL staff, volunteers and governors will undertake any additional specialised training on matters such as Child Sexual Exploitation, Prevent, Peer on Peer abuse, Private Fostering, Adverse childhood experiences, etc as is deemed necessary by the SLT and that is particularly relevant to the context and needs of the pupils who attend PCHSC. This will be informed by feedback from staff / governor surveys

- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSL/s
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school such as taking part in surveys and as part of appraisal
- Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date.

7. Multi-Agency Working

PCHSC contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements. Further details on www.safeguardingpartnership.org.uk

PCHSC will be fully engaged, involved, and share information with local safeguarding arrangements / partners. Once PCHSC is named as a relevant agency by local safeguarding partners, we will follow our statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

PCHSC will work with the Children & Family Well – Being Team, Children’s Social Care (CSC), the Police, Health services and other relevant partners and agencies for the benefit of families and children ensuring contribution to multi-agency plans to provide additional support.

Where a need for Early Help is identified, PCHSC will allow access for CSC from the host Local Authority (LA) and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

PCHSC also recognises the particular importance of inter-agency working in identifying and preventing CSE and CCE.

Information sharing

PCHSC recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils’ needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

8. Early help

Early help means providing support as soon as the need emerges, at any point in a child’s life. Staff at PCHSC recognise that any professional can provide early help. At PCHSC our Family Liaison Officer, Alison McConville and our Special Needs School Nurses form part of the Early Help offer at our school / college.

Any pupil or family may benefit from early help and staff will be alert to the potential need specifically 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
- Is misusing drugs or alcohol
- 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
- Have returned home to their family from care
- Are at risk of (Honour Based Abuse) HBA, such as (Female Genital Mutilation) FGM or forced marriage
- Are privately fostered
- Are displaying harmful sexual behaviours which may pose a risk to other children and themselves
- Are persistently absent from education, including persistent absences for part of the school day
- Show any other early signs of abuse, neglect any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children.

The DDSL, Alison McConville (Family Liaison Officer), and DSL, Claire Endersby (Assistant Headteacher) take the lead where early help is appropriate and consent has been gained. 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 to help provide the right, effective support at the right time.

[Early Help Assessment - information for professionals - Lancashire County Council](#)

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 assessing the impact of the support.

We therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or pupil may benefit from Early Help and can follow school procedures to share this with the DSL
- The DSL / Deputy DSL undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required
- DSL / Deputy DSL will signpost and refer to appropriate support agencies
- DSL/ Deputy DSL will lead on TAF meetings where is it appropriate for them to do so
- DSL / Deputy DSL will follow the local safeguarding processes and refer to Children's Social Care where Early Help has not been successful in reducing risk and meeting unmet needs using the Levels of Need contained within Working Well with Children and Families in Lancashire guidance <https://www.lancshiresafeguarding.org.uk/media/19299/wwwcf-part-1-and-2-final.pdf>

9. Abuse and neglect

Abuse is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. 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.

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. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

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.

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.

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 be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual 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 that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.
- ALL staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.
- ALL staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL. Specific issues include, but are not limited to:

10. Domestic abuse

In line with the Domestic Abuse Act 2021, **domestic abuse** is defined as abusive behaviour of a person towards another person 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.

The school will recognise the serious, long lasting emotional 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.

PCHSC has a commitment to Operation Encompass and informing all stakeholders of the initiative. The lead person for Operation Encompass is Claire Endersby, Assistant Head. For more information visit www.operationencompass.org

11. Homelessness

The DSL and deputy DSL(s) are aware of the contact details and referral routes into the Local Housing Authority so that concerns and support over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to” or frequent moves.

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSC will be made as necessary where concerns are raised.

12. Children absent from school.

Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Attendance 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.

Where reasonably possible schools and colleges **will hold more than one emergency contact number for their pupils and students.**

PCHSC will follow local guidance when children go missing from home

<https://www.safeguardingpartnership.org.uk/missing-from-home-protocol-trigger-plan/>

13. Children attending an approved educational activity

An approved educational activity is where a pupil is attending another school at which they are registered or taking part in off-site activity such as field trips, educational visits, work experience or unregistered alternative provision.

Pupils can only be recorded as attending an off-site activity if it is approved by the school, of an educational nature and supervised by someone authorised by the school. Ultimately, school are

responsible for the safeguarding and welfare of pupils taking part in an off-site educational activity so it would be reasonable to expect that the school would only authorise someone who was answerable to the school to supervise an activity. Such activities include:

- Dual registered at another school
- Participating in a supervised sporting activity
- Educational visit or trip
- Work experience.

All relevant school policies continue to apply throughout any approved educational activity. Any activity which is approved will be risk assessed (where relevant) and school will ensure that attendance at any activity is monitored and robust communication is agreed with the provider/accompanying adults.

14. Child criminal exploitation (CCE)

Child criminal exploitation is defined as 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, for any 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 (this could be online or through technology)

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of **any gender** are at risk of CCE.

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

- 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
- Appearing with unexplained gifts, money or new possessions.

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered in addition to normal safeguarding procedures.

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, collecting money
- Being found in accommodation they have no connection
- Owing a 'debt bond' to their exploiters
- Having their bank account used to facilitate drug dealing.

15. Child sexual exploitation (CSE)

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, this could be online or through technology.

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 and 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 staff will consider the language and terms used when raising concerns and providing ongoing support to pupils who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

16. Concealed and denied pregnancy.

A concealed pregnancy is when a woman knows she is pregnant but does not tell anyone; or when she tells a professional but conceals the fact that she is not accessing antenatal care; or when she tells another person or persons and together they conceal the fact from all agencies. A denied pregnancy is when an

expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or be misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant. There may be a number of reasons why a pregnancy is concealed or denied, including, but not limited to; fear of stigma or shame, in cases of rape, sexual or domestic abuse, forced or sham marriage, in cases of rape, sexual or domestic abuse, forced or sham marriage, fear of a child being removed or asylum seekers and illegal immigrants who may be reluctant to come to the attention of authorities. In some cases the woman may be truly unaware that she is pregnant. In some cases an expectant mother may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements.

[Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership \(proceduresonline.com\)](http://proceduresonline.com)

Further training is available for staff regarding concealed or denied pregnancy

[Concealed-and-Denied-Pregnancy-2020-7MB.pdf \(lancshiresafeguarding.org.uk\)](http://lancshiresafeguarding.org.uk)

17. Modern slavery

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. (From The Modern Slavery Act 2015, Section 52) The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking'.

18. Female Genital Mutilation (FGM)

FGM is defined as 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.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSC and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements. As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSC as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society
- The pupil coming from a community known to adopt FGM
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE
- Travel abroad or a long holiday with relatives to a country known to practise FSM.

FGM is 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. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

19. Forced marriage

Forced marriage is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit.

20. Extremism & Radicalisation

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.

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

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.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with

all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

PCHSC Online Safety Policy will ensure the safety of children by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering software is in place. DSLs understand when it is appropriate to make a referral to the Channel Panel and are aware of how to do so.

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**, forming part of the school’s wider safeguarding obligations.

PCHSC will ensure that ALL Staff, Governors and volunteers are informed and have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty.' Claire Endersby, Designated Safeguarding Lead is the Prevent Lead. A Prevent duty risk assessment was completed in 2019 and last reviewed / updated in August 2023.

21. 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.

22. Pupils with family members in prison

Pupils with a family member in prison will be offered bespoke support appropriate to their needs.

23. Child-on-child abuse including sexualised abuse

Child-on-child abuse is defined as abuse between children. PCHSC has a zero-tolerance approach to abuse, including child-on-child abuse.

PCHSC will refer to the specific guidance in Keeping Children Safe in Education Part five: Child-on-Child Sexual Violence and Sexual Harassment and Lancashire Procedures. [5.31 Peer Abuse \(proceduresonline.com\)](https://www.proceduresonline.com)

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 challenging 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.
- 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.

All staff will be made aware of the heightened vulnerability of the pupils at PCHSC all of whom have SEND, and evidence suggests are more likely to be abused than their peers.

Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils.

The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

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. This process will be continually reviewed by SLT.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Positive relationships, behaviour and SEMH policy. Staff will follow these procedures, as well as the procedures outlined in the school's online safety Policy, Anti-Bullying Policy and Exclusion Policy, where relevant.

PCHSC and the DSL will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues.

Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:

- the victim

- the alleged perpetrator
- all other children (and if appropriate adult students and staff).
- Risk assessments will be recorded and kept under review as a minimum termly
- Refer to Guidance in Keeping Children Safe in Education Sept 2023, Part 5.

24. Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment or trauma.
- Having been involved in offending, such as theft or robbery.
- Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

25. Online safety

Staff at PCHSC will adhere to the Online Safety Policy at all times and is committed to keeping children safe online. As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

PCHSC will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material. This system will be monitored and reviewed with any inappropriate behaviours or searches being followed up appropriately.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy. When school become aware of an online safety issue that has occurred outside of school, it is managed in accordance with the school Online Safety Policy / Positive relationships, behaviour and SEMH Policy.

Staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff don't rely solely on IT systems as this may leave some children vulnerable.

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.

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 Acceptable Behaviour Policy (ABP) and Staff Code of Conduct

Where photographs and videos will involve pupils who are CLA, 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 CLA 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. PCHSC is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

School will therefore ensure that:

- parental consent is obtained to take and use photographs and/or videos of children, for use in school, to market the school or to share on social media / internet
- staff, visitors, volunteers and students do not use their own mobile phones or devices to take or record any images of children.

Upskirting

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.

26. Sharing nude and semi-nude images

Formerly referred to as 'Sexting', sharing nudes and semi-nudes is defined as *'the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums'*. (UKCIS, 2020)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

PCHSC will ensure that all staff are aware to treat the sharing of indecent images as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with such instances in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images and how and when to report.

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 sharing nudes/semi-nudes 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 involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes;- including where there is an adult involved, where there is an intent to harm the pupil or where the images are used recklessly.
- **Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.

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; this is illegal.
- discuss the decision with the Headteacher or a member of the senior leadership team
- 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 senior leadership team
- make sure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Headteacher or a member of the senior leadership team's office
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person 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.
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called.

27. Context of safeguarding incidents (Contextual safeguarding)

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSL(s), 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 CSC or external agencies.

28. Pupils potentially at greater risk of harm

PCHSC recognises that some groups of pupils can face additional safeguarding challenges, 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 outline 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 within each school will hold and use information from their 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 and educational outcomes, e.g. considering the provision pastoral or academic support and support with behaviour.

- **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, PCHSC will ensure it informs their 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 a school within the trust for EHE, the school 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.

Where children are removed from roll for Elective Home Education and there are safeguarding concerns, school will ensure that concerns are shared with the LA.

- **CLA**

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. Previously CLA, also known as care leavers, can also remain vulnerable after leaving care.

The school will ensure 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.

- **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. All 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.

- **Adverse Childhood Experiences and trauma**

We acknowledge that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development.

Where a pupil is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the pupil and in line with all relevant guidance and policies. This may include close multi-agency working with external services.

- **Pupils with SEND**

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

- Pupils with SEND or disabilities are nearly 4 times more likely to be a victim of abuse
- 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
- At PCHSC when reporting concerns or making referrals for our pupils, all of whom have SEND, the above factors will always be taken into consideration.

29. Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, 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 CSC or the police, if necessary.

PCHSC will always consider safeguarding arrangements when an extracurricular activity or club is arranged and ensure DSL availability. Where appropriate ensuring that a transfer of control document has been completed for external agencies and the school is satisfied that the agency has appropriate safeguarding policies and procedures in place.

30. 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 and have clear communication procedures in place in view of attendance.

31. Work experience

Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16 and is deemed to be in regulated activity.

32. 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 CSC 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 CSC. Where CSC 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 CSC 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.

If the school are dissatisfied, local escalation procedures will be followed. [8.1 Resolving Professional Disagreements \(Escalation and Conflict Resolution\) \(proceduresonline.com\)](#)

33. Concerns about staff 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, Trevor Ashton, tashton@pchs.lancs.sch.uk.

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

34. Allegations of abuse against staff and low level concerns

There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children.

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the school's Whistleblowing 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".

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.

All staff at PCHSC are aware of these procedures and aware of the following expectations and protocol:-

- ALL staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff) conduct to the Headteacher
- ALL staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the Headteacher to the Chair of Governors and how to contact them
- The Headteacher and/or Chair of Governors will discuss the allegation with the Local Authority Designated Officer (LADO)
- CSAP procedures for dealing with allegations against staff will be followed
- http://panlancashirescb.proceduresonline.com/chapters/p_allegations.html
- ALL staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform the Headteacher if any adult's conduct gives cause for concern
- All low-level concerns surrounding staff or any adult in a position of trust should be reported to the Headteacher.
- ALL staff are aware of the school's Whistle Blowing Policy which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place
- Staff are fully aware of the Guidance for Safer Working Practice February 2022, Staff Code of conduct and Staff Handbook and are aware of professional expectations of their own behaviour and conduct.
- Further information, LADO information and flowchart of how allegations are managed: -



2021 LADO Flyer
May 2021.doc



2021 LADO
Allegations Notifica

PCHSC recognises that children may make disclosures against someone who is in a position of trust not in the school setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, we recognise that we must refer to the LADO and share information.

Low Level Concerns

PCHSC ensure that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

PCHSC promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. PCHSC strives to embed a culture of openness, trust and transparency in which our values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

PCHSC ensures that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low level concerns and will be empowered to do so. Staff must report their concerns to the Head teacher.

If concerns are surrounding the Headteacher, these must be referred to the Chair of Governors. Guidance from Keeping Children Safe in Education, September 2023 will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, the Headteacher, will consult with LADO for guidance.

The governing body will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff code of conduct and the positive relationships, behaviour and SEMH policy. They will ensure procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

35. Safer recruitment

PCHSC is committed to keeping pupils safe by ensuring that adults who work or volunteer in school are safe to do so. We therefore ensure that:

- Keeping Children Safe in Education, September 2023, Part 3 is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff

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 teaching, training, instructing or 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. (*Regular is defined as; at least 3 times in a 30 day period.*)

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The governing body will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

School will ensure that:

- The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.
- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear
- There are sufficient staff/Governors who have undertaken appropriate Safer Recruitment training in the last 5 years to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel
- Covering (umbrella) letters will be obtained from agencies and other employers that provide staff to work in school to confirm that appropriate checks have been undertaken in line with Keeping Children Safe in Education, September 2023
- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer
- A transfer of control agreement will be used where other agencies/organisations use school premises and are not operating under school's safeguarding policies and procedures
- Adults who are involved in the management or provision of child care of children in Early Years, or in out of school provision for children up to 8 years old, will make a declaration that they are not disqualified under the Child Care Act 2006.
- When an issue is declared, advice will be sought from Ofsted about the need to apply for a waiver. If a waiver is necessary, a risk assessment will be carried out and proportionate measures put in place until a waiver has been issued or matters resolved. If it is not resolved, this must be reported:- disqualification@ofsted.gov.uk
- Advice will be sought from Human Resources, LADO and/or Schools Safeguarding Officers if any staff are unclear about any aspects of Safer Recruitment.

In addition, as a DBS check has no expiry date and the information revealed will only be accurate at the time the certificate was issued so PCHS will begin a rolling program of renewing enhanced DBS checks for all staff that have been in post for longer than 3 years.

Referral to the DBS

There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

Conducting Online Searches (see Appendix i) PCHSC will carry out an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online. We will advise applicants of this intention in the job advert.

Single central record (SCR)

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

All members of the Governing Body are also recorded on the SCR.

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
- Any other information deemed relevant.

If any checks have been conducted for volunteers or Governors, these may 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.

The details of an individual will be removed from the SCR once they no longer work or volunteer at the school.



36. Review

This Policy is subject to ongoing review; however, will be reviewed no later than September 2024.

37. Key contacts, roles and training

Review Dates	Policy adopted by the Governing Body on:	September 2023
	Policy to be reviewed no later than:	September 2024
Key Personnel	Designated Safeguarding Lead (DSL)	Claire Endersby, Assistant Headteacher
	Date DSL Training Attended	15 th December 2022 Advanced Safeguarding for DSLs

and Training Details	Other relevant training	18 th January 2023 DSL training (LCC) Safer Recruitment (Sept 2021) Prevent Training (January 2023) Early Help (2 days) (June/July 23)
	Back-up/Deputy DSL(s)	Alison McConville, Family Liaison Officer
	Date DSL Training Attended	July 2021 (Refresher)
	Other relevant training	December 2022 Advanced DSL training Managing risk of radicalisation in your education setting (January 2023) Neglect graded care profile 2 training (October 2022)
	Back-up/Deputy DSL(s)	Debra Grogan Headteacher
	Date DSL Training Attended	24 th March 2022 Advanced Safeguarding for DSLs (Refresher)
	Prevent Lead	Claire Endersby
	Date Prevent/WRAP training attended	Refresher – 13.06.23 Refresher – 25.01.2022 Refresher 15/07/2020 A Prevent Refresher Webinar 23 rd October 2019 Prevent e-learning training course. https://www.elearning.prevent.homeoffice.gov.uk 22 nd November 2015
	Headteacher	Debra Grogan
	Date safeguarding training attended (state type)	24 th March 2022 Advanced Safeguarding for DSLs (Refresher) 15 th & 20 th April 2021 Safer Recruitment
	Chair of Governors	Trevor Ashton
	Date safeguarding training attended (state type)	1 st September 2022 KCSIE Briefing PCHS INSET
	Safeguarding Governor	Angela Ansley
	Date safeguarding training attended (state type)	Safeguarding Governor Training June 2022 (refresher)
Useful Contacts	LCC School Safeguarding Officers Victoria Wallace & Mechelle Lewis	01772 531196 school.safeguarding@lancashire.gov.uk
	Local Authority Designated Officer (LADO) Tim Booth, Donna Green & Shane Penn	01772 536694 LADO.admin@lancashire.gov.uk
	LCC MASH Education Officers Matt Chipchase & Jenny Ashton	Jenny Ashton 01772 531643 jennifer.ashton@lancashire.gov.uk Matt Chipchase 01254 220989 matt.chipchase@lancashire.gov.uk
	MASH – Multi-Agency Safeguarding Hub	0300 123 6720 0300 123 6722 between 5.00pm - 8.00am
	Whistleblowing	01772532500 WhistleblowingComplaints@lancashire.gov.uk

Policy approved by governors:	September 2023
Review Date:	By September 2024 (interim Jan 2024)
Signed: T Ashton, Chair of Governors	
Signed: D Grogan, Head Teacher	

Appendix i. Keeping Children Safe in Education 2022 Conducting Online Searches

Keeping children safe in education (KCSIE) 2022 paragraph 220 states:

"In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.

Rationale for the change

In 2019 there was a case reported in the national media where an Oxford primary school employed a Spanish woman as a teaching assistant, unaware that she had been convicted in Spain for killing a child.

The school had completed the necessary criminal records checks. However, the law in the specific country stated that if a person under the age of 18 commits an offence, the offence is removed from their criminal record after 10 years. Because the individual was under 18 and applied for the job in the UK after 10 years, their criminal record was clear, and the school was not made aware of this issue. While the school did not do anything wrong, an internet search would have revealed this information.

Advice for schools

- 'Should' in statutory guidance means that you should do it unless you have a good reason not to; if you decide that you have a good reason not to undertake the search, it is recommended that you retain a written rationale for this.
- 'Online search' is not the same as a search of candidates' social media activity. It is important to note that the DfE is not encouraging potential employers to search candidates' social media presence -schools should not be looking at Facebook, Instagram, etc., as this could introduce bias into the recruitment process and result in recruiters discriminating against candidates. There could be information on some candidates and not on others and some candidates may have tighter privacy settings than others, thereby limiting the information available. It would also potentially be a breach of data protection to search an individual's social media presence, particularly if that search is done covertly.
- Your processing condition under GDPR UK/ DPA 2018 is that it is a regulatory requirement; you therefore do not need consent from candidates to undertake the search. However, the applicant has a right to know beforehand that this search will be conducted if they are shortlisted. Schools should therefore consider adding this information to the recruitment information shared with candidates e.g. in the advert, recruitment materials, invitation to interview letter etc, ensuring that the candidate is informed in advance of the search being undertaken. e.g. Please note that in line with Keeping Children Safe in Education 2022 an online search will be carried out as part of our due diligence on shortlisted candidates.
- Schools and colleges should decide who will undertake online searches. Ideally, the online search should not be completed by a member of the recruitment panel as they may find information that is not relevant regarding sexuality, gender, religious views etc which may result in personal bias or may leave the panel open to claims of such bias.
- The person undertaking the searches should be given a clear outline of what they are looking for, how to record it and who to pass the information to. Bearing in mind this is part of a safeguarding check, the search is purely about whether the individual is suitable to work with children, and the individual undertaking the search needs to be clear on what information they should and shouldn't share with the panel.

- Copies of the information should be saved via a screenshot/printing off a hard copy of the information available so that the recruitment panel can see what has been discovered and can justify any recruitment decisions made as a result of the additional information.
- Recruitment panels need to remember that criminal information found via a search engine is still covered by the Ministry of Justice filtering rules - if the conviction / caution would be filtered, it should not be discussed with the candidate and cannot be taken into account in making recruitment decisions. Guidance and criteria on the filtering of cautions and convictions can be found on the Ministry of Justice website.
- Information recorded by the school regarding an online search (emails from the person conducting the searches to the panel, etc) is subject to data protection legislation and would be disclosable under a Subject Access Request - it is important that schools ensure that the information considered is fair, factual and does not introduce personal bias.
- There is no requirement to add an 'online searches' column to the Single Central Record but schools may choose to do so in the same way that they may record other nonstatutory information.
- When conducting online searches the school might wish to consider searching for
 - (Candidate current/past names) convicted
 - (Candidate current/past names) crown court
 - (Candidate current/past names) magistrates court
 - (Candidate current/past names) followed by towns/cities in which they have lived/worked
 - (Candidate current/past names) guilty
 - (Candidate current/past names) investigation
- Schools should also ensure that they ask their preferred supply agencies to confirm that they are now including on line searches in their vetting procedures.

Where information is discovered via an online search

- If information has been discovered, this should be compared with the candidate's application form, employment history and criminal / suitability self-disclosure and then discussed with the applicant at interview - the questions asked and responses provided by the applicant should be recorded on the interview notes.
- If the information relates to a serious incident or demonstrates that the candidate has been dishonest in their application / self-disclosure, seek advice from the LADO and / or the schools HR Manager before discussing with the candidate at interview.
- Following discussion, the panel will decide whether or not they deem the candidate suitable for appointment.
- Information found as a result of an online search on an unsuccessful candidate should be retained for twelve months after the appointment has been made. This will enable the panel to justify their decisions in the event that a challenge is made in relation to the selection process via a complaint or through an Employment Tribunal.

Once the recruitment panel are satisfied that information found on a successful candidate does not rule them out of appointment, they should record that decision and the reasoning behind such a decision on the candidate's personal file and retain copies of any information considered. The purpose of the record is to assist in justifying the appointment and to help prevent unnecessary re-investigation if such information resurfaces after a period time. The reasoning behind the retention of such information should be clearly explained to the candidate.