

HILBRE HIGH SCHOOL HUMANITIES COLLEGE

CHILD PROTECTION AND SAFEGUARDING POLICY

Author: Date ratified at Full Trustees: Date to be reviewed: Dave White March 2023 February 2024

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IF YOU ARE CONCERNED THAT A CHILD IS AT RISK IN ANY WAY, PLEASE FOLLOW THE PROTOCOL LISTED BELOW:

Refer concerns to one of the following members of the School Leadership Team

- Mr D White (Assistant Headteacher and Designated Safeguarding Lead DSL) <u>whited@hilbre.wirral.sch.uk</u>
- Mr P Lloyd (Deputy Headteacher/Deputy Designated Safeguarding Lead DDSL) <u>lloydp@hilbre.wirral.sch.uk</u>
- Mrs J Whisker (Deputy Headteacher/Deputy Designated Safeguarding Lead DDSL) <u>whiskerj@hilbre.wirral.sch.uk</u>

Staff members can report concerns at any time using the school's safeguarding software "My Concern".

Other Key Contacts:

Role	Name	Contact Details	
Chair of Trustees	Mike Cockburn	0151 625 5996	
		schooloffice@hilbre.wirral.sch.uk	
Headteacher	Mark Bellamy	0151 625 5996	
		schooloffice@hilbre.wirral.sch.uk	
Trustee i/c Child	Julie Money	0151 625 5996	
Protection and Safeguarding		Schooloffice@hilbre.wirral.sch.uk	
Social Worker in School	Chelsie Pickford	0151 625 5996	
		chelsieleepickford@wirral.gov.uk	
Safer School Police Officer	PC William Hughes	0151 625 5996	
		William.Hughes@merseyside.police.uk	
Prevent Co-ordinator	Alison Burnett	07394 559106	
		Alison.Burnett@liverpool.gov.uk	
Integrated Front Door	Wirral Social Services	0151 606 2008	
(IFD)		ifd@wirral.gov.uk	
Wirral Virtual Head for Children Looked After (CLA)	Trish Lewis	trishlewis@wirral.gov.uk	

RECORD OF HILBRE HIGH SCHOOL STAFF SAFEGUARDING TRAINING

Training Level	Date Completed	Date of Renewal
Whole school staff training	September 2022	September 2023
Whole school Prevent training	March 2023	March 2025
Designated Safeguarding Lead training	December 2022 Mr David White (DSL)	December 2024
	May 2021 Mr Paul Lloyd (DDSL)	May 2023
	March 2023 Mrs Jane Whisker (DDSL)	March 2025
Safer Recruitment training	December 2022 Mrs Emma Harrison (Assistant Headteacher) Mr David White (DSL) Mrs Jane Doyle (School Business Manager)	December 2025

1. Safeguarding Ethos at Hilbre:

Safeguarding is what we do for all children at Hilbre High School to ensure they are safe. Child Protection is the swift and effective actions we take at Hilbre in response to a child being harmed or becoming at risk of significant harm.

Hilbre aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

Review of Child Protection and Safeguarding policy to be undertaken by Safeguarding Board consisting of Julie Money (Safeguarding Trustee) and Mark Bellamy (Headteacher).

2. Legislation and statutory guidance:

This policy is based on the Department for Education's statutory guidance <u>Keeping Children Safe in</u> <u>Education (2022)</u> and <u>Working Together to Safeguard Children (2018)</u>, and the <u>Governance Handbook</u>. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the <u>Education (Independent School Standards) Regulations 2014</u>, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- <u>The Children Act 1989</u> (and <u>2004 amendment</u>), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the <u>Serious</u> <u>Crime Act 2015</u>, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- <u>Statutory guidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- <u>The Rehabilitation of Offenders Act 1974</u>, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the <u>Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children.
- <u>Statutory guidance on the Prevent duty</u>, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- <u>The Human Rights Act 1998</u>, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the <u>European Convention on Human Rights</u> (ECHR).
- <u>The Equality Act 2010</u>, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Trustees and Headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- <u>The Public Sector Equality Duty (PSED)</u>, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues, such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

Hilbre High School complies with all guidance published by our 3 local safeguarding partners identified below. The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

- Local Authority (Wirral Local Authority)
- Chief Officer of Police (Merseyside Police)
- Clinical Commissioning group (Wirral Clinical Commissioning Group)

3. Definitions:

Safeguarding and promoting the welfare of children means:

- 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.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement:

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.

- Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.
- Are missing from education.
- Whose parent/legal guardian has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities:

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Trustees in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy.
- Pastoral support system.
- Planned programme of personal relationships, sex and health education (PSHE), which is inclusive and delivered regularly, tackling issues, such as:
 - ✓ Healthy and respectful relationships.
 - ✓ Boundaries and consent.
 - ✓ Stereotyping, prejudice and equality.
 - ✓ Body confidence and self-esteem.
 - ✓ The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
 - ✓ What constitutes sexual harassment and sexual violence and why they're always unacceptable.

5.1 All staff:

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, <u>Keeping Children Safe in Education</u>, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (eg. sites they need to visit or who they'll be interacting with online).
- Provide a safe space for students who are LGBT to speak out and share their concerns

All staff will be aware of:

- Hilbre's systems which support safeguarding, including this Child Protection and Safeguarding policy, the Staff Behaviour policy/Code of Conduct, the role and identity of David White, the Designated Safeguarding Lead (DSL) and Paul Lloyd and Jane Whisker, the Deputy Designated Safeguarding Leads, the Behaviour policy, and the Safeguarding response to children who go missing from education.
- The Early Help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- What to look for to identify children who need help or protection.

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL):

The DSL is a member of the Senior Leadership Team. Hilbre's DSL is David White (Assistant Headteacher). The DSL takes lead responsibility for child protection and wider safeguarding in Hilbre.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Staff can also record Safeguarding issues on "My Concern".

The DSL can be contacted out of school hours via email <u>whited@hilbre.wirral.sch.uk</u>.

When the DSL is absent, Paul Lloyd DDSL/Deputy Head and/or Jane Whisker DDSL/Deputy Head will act as cover. If the DSL and DDSLs are not available, Mark Bellamy (Headteacher) will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, (and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.

The DSL will also:

- Keep the Headteacher informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns, as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and [deputy/deputies] are set out in their Job Description.

5.3 The Trustee Board:

The Trustee Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior board level link Trustee to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. At Hilbre High School, the Trustee is Julie Money.

The Trustee's will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll).
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them, if needed.
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see Appendix 3).

All Trustees will read Keeping Children Safe in Education in its entirety.

5.4 The Headteacher:

The Headteacher is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

• Are informed of our systems which support safeguarding, including this policy, as part of their induction.

- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/legal guardians when their child/ward joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensuring the relevant staffing ratios are met, where applicable.

5.5 Virtual school heads:

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker.

They should also identify and engage with key professionals, eg. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality:

Hilbre High School recognises the importance of confidentiality and data protection of individuals. In respect to safeguarding, Hilbre recognises that the protection of a child/ward will lead to the sharing of information. Information of a confidential nature can be shared between the three local safeguarding partners. Information/data held on children and staff is treated with care and professionalism in accordance to Hilbre GDPR Guidance 2022.

You should note that:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider that:

- Parents or legal guardians should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of

criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL.

Confidentiality is also addressed in this policy with respect to record-keeping.

7. Recognising abuse and taking action:

Staff, volunteers and Trustees must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger:

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

Tell the DSL (see Section 5.2) as soon as possible if you make a referral directly. Staff can refer using **"My Concern"** safeguarding software.

All staff are trained to make an Integrated Front Door referral via the wirral.gov website to alert abuse to local council via social services: <u>https://www.wirral.gov.uk</u>

7.2 If a child makes a disclosure to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the David White (DSL). Staff at Hilbre will use "My Concern". Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1) and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- Bear in mind that some children may: Not feel ready, or know how to tell someone that they are being abused, exploited or neglected. Not recognise their experiences as harmful.

Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop you from having a **'professional curiosity'** and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a student is at risk of FGM:

• Keeping Children Safe in Education explains that FGM comprises "all procedures involving 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. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care, as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and Wirral local safeguarding procedures will be followed.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger):

Where possible, speak to the DSL first to agree a course of action.

Advice from Hilbre's Social Worker in School (SWiS) will be sought.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a Deputy Designated Safeguarding Lead or member of the Senior Leadership Team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'referral' below). Share any action taken with the DSL as soon as possible. Figure 1 on Page 14 outlines pathways for staff at Hilbre to follow.

Early help assessment:

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The SWiS will play a pivotal role in identifying way forward in consultation with the DSL.

David White (DSL) works closely with the Early Help Assessment Team on the Wirral to ensure all resources offered are available to the child/family.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral:

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support staff to do so.

If staff at Hilbre make a referral directly (see Section 7.1), they must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

David White (DSL) is responsible for keeping a record of young people open to Early Help (Team around the Family-TAF), Child In Need and Child Protection. The effectiveness of these supportive measures will be reviewed in consultation of other agencies.

7.5 If you have concerns about extremism:

If a there are concerns regarding a child being exposed to extremism and radicalisation, the referral process above must be followed.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. Links to Prevent Coordinator can be found in the Key Contacts link on the first page of this document.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Trustees can call to raise concerns about extremism with respect to a student. You can also email <u>counter.extremism@education.gov.uk</u>. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related.

7.6 If you have a mental health concern:

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.

Hilbre Staff have been trained and will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 7.4.

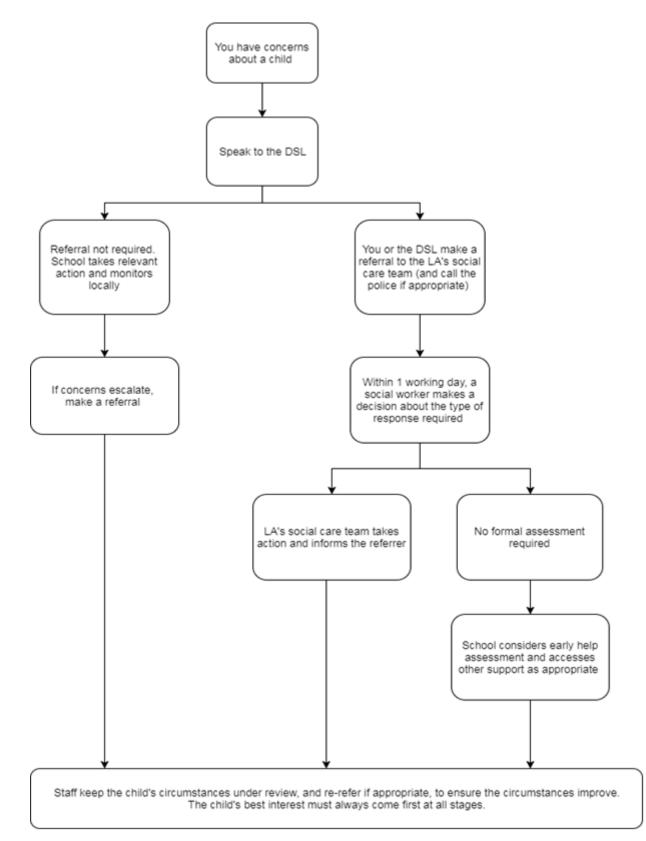
If staff have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action. The DSL will work closely with the School Mental Health Lead to establish effective action.

Hilbre employs mental health practitioners to counsel young people, when appropriate.

Appropriate staff members at Hilbre at trained to make referrals through to CAMHS, if appropriate.

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

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



7.7 Concerns about a staff member, supply teacher, volunteer or contractor:

If staff have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, they will tell the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, the Chair of Trustees will be contacted.

The Headteacher/Chair of Trustees will then follow the procedures set out in Appendix 3, if appropriate. Where appropriate, the school will inform the LADO/Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other students:

Staff at Hilbre recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

Hilbre also recognises the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our school's Behaviour policy, but this Child Protection and Safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence;
- could put students in the school at risk;
- is violent;
- involves students being forced to use drugs or alcohol;
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

See Appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse:

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate it. The report will be recorded on "My Concern".
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to, if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation. David White (DSL) will work closely with the Safer School Police officer to establish most effective way forward.

Creating a supportive environment in school and minimising the risk of child-on-child abuse:

At Hilbre we recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate students about appropriate behaviour and consent.
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below).
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening staff should maintain an attitude of "it could happen here".
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to.
- A friend may make a report.
- A member of staff may overhear a conversation.
- A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, eg. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
- Taking action would prejudice an investigation and/or subsequent prosecution we will liaise with the police and/or LA children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.9 Sharing of nudes and semi-nudes ('sexting'):

Hilbre staff are aware of their responsibilities when responding to an incident.

If Hilbre staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or legal guardians.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting:

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff - this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the students involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or legal guardians of the student(s) involved (in most cases parents/legal guardians should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any student in the images or videos is under 13.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL:

If, at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the student(s) involved, if appropriate.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/legal guardians:

The DSL will inform parents/legal guardians at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police:

If it is necessary to refer an incident to the police, this will be done through the safer schools officer, a police community support officer.

Recording incidents:

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping of such events will be held on "**My Concern**" safeguarding software.

Curriculum coverage:

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is?
- How it is most likely to be encountered?
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our systems:

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, Hilbre will:

- Put systems in place for students to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students.

Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- Give feedback.

• Make sure Hilbre students are aware of the reporting systems and processes in school. They are aware of who the DSL is. They are aware that they can approach any staff member they feel comfortable with and they will be treated with care.

8. Online safety and the use of mobile technology:

In line with KCSIE guidance, Hilbre's Child Protection and Safeguarding policy reflects the guidance stated in our Online Safety and the Use of Mobile and Smart Technology policies.

Hilbre recognises the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our Hilbre aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and Trustees.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk:

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

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

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

Educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/legal guardians about online safety via our website, communications sent directly to them and during Parents' Evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when students are not present. Staff will not take pictures or recordings of students on their personal phones or cameras.

- Make all students, parents/legal guardians, staff, volunteers and Trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, students and parents/legal guardians are aware that staff have the power to search students' phones, as set out in the DfEs guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our Online Safety policy and Mobile Phone policy, which you can find on our website.

9. Notifying parents or legal guardians:

Where appropriate, we will discuss any concerns about a child with the child's parents or legal guardians. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or legal guardians about any such concerns following consultation with the DSL.

If we believe that notifying the parents or legal guardians would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or legal guardians of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or legal guardians, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or legal guardians to discuss support for them, and what's being put in place that will impact them, eg. moving them out of classes with the victim, and the reason(s) behind any decision(s).

10. Students with Special Educational Needs, disabilities or health issues:

At Hilbre we recognise that students with Special Educational Needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students.
- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

We offer extra pastoral support for these students at Hilbre. This includes:

• All staff having access to one page portfolios for all our SEND students. The information found on these portfolios guide staff on how to best interact with the individual involved.

- Our pastoral staff have a good knowledge of communication techniques to use with students with additional needs/communication needs.
- Teaching Assistants and Support Staff develop key relationships with our SEND students leading to excellent communication.
- Some of Hilbre's most vulnerable SEND students have access to our Base and Nurture Provisions. Staff are specially trained in these areas to communicate with these students and recognise the signs of abuse.
- Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. Students with a social worker:

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Hilbre has a Social Worker in School based in the Safeguarding Office with the DSL. This resource leads to both proactive work and speedy reactive interventions.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes.

For example, it will inform decisions about:

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

12. Looked-after and previously looked-after children:

Hilbre ensures that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, Hilbre will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The DSL has details of children's social workers and relevant virtual school Headteacher. Details of both can be found in the contacts list at the beginning of this policy.

We have appointed a designated teacher, David White (DSL), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will ensure that any safeguarding concerns regarding lookedafter and previously looked-after children are quickly and effectively responded to.

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium, plus funding, can be best used to support looked-after children and meet the needs identified in their personal education plans.

13. Complaints and concerns about school Safeguarding policies:

13.1 Complaints against staff:

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

13.2 Other complaints:

Hilbre handles safeguarding-related complaints in a transparent and consistent manner. The Headteacher has a clear overview of all safeguarding procedures and is constantly kept up to date via the DSL. The trustee i/c safeguarding audits procedures and effectiveness of child protection and safeguarding at Hilbre. The trustee and Headteacher will respond to any complaints.

13.3 Whistle-blowing:

An individual who wishes to identify an area of malpractice or wrongdoing within the school should be able to do so with confidence and protection.

The options available for reporting a concern, including who to approach within the school and externally are clearly laid out in the Whistle-blowing policy. How the school will respond to such concerns are covered and what protection is available to staff who report another member of staff is also covered in the policy.

14. Record-keeping:

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. These records are held on "My Concern".

Records "My Concern" will include:

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

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

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

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

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and preappointment checks.

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

15. Training:

15.1 All Hilbre staff:

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment.
- Have a clear understanding of the needs of all students.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and [deputy/deputies]:

The DSL and [deputy/deputies] will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

15.3 Trustees:

All Trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

15.4 Recruitment - interview panels:

At least 1 person conducting any interview for any post at the school will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe In Education, and will be in line with local safeguarding procedures.

See Appendix 2 Hilbre's Safer Recruitment policy.

15.5 Staff who have contact with students and families:

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements:

This policy will be reviewed annually by the Headteacher and Trustee i/c Safeguarding. After every review, it will be approved by the full Board of Trustees.

17. Links with other policies:

This policy links to the following policies and procedures:

Behaviour Staff Behaviour Anti-Bullying Equality GDPR Children with Health Need SEND Drugs Disability, Equality and Diversity Complaints Health and safety Attendance Online safety Mobile phone use PSHE/RSE First aid

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or legal guardian failing to:

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

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

Appendix 2: Safer Recruitment policy



HILBRE HIGH SCHOOL HUMANITIES COLLEGE

SAFER RECRUITMENT POLICY

Author: Date to be reviewed: Emma Harrison September 2023

INTRODUCTION:

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. Hilbre High School is committed to safeguarding and promoting the welfare of all students in its care. As an employer, the school expects all staff and volunteers to share this commitment. Our safeguarding responsibilities inform our practices throughout the recruitment and selection process. We have given careful consideration and attention to the guidance provided by the Department for Education (DfE) 'Keeping Children Safe in Education':

PURPOSE:

The purpose of the policy is to:

- Attract the best possible applicants to vacancies.
- Deter prospective applicants who are unsuitable to work with children.
- Identify and reject applicants who are unsuitable to work with children.
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital status, disability or age.
- To ensure compliance with all relevant recommendations and guidance, including the recommendations of the DfE.
- To ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

The school has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the school based on the applicant's abilities, qualification, experience and merit as measured against the Job Description and Person Specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation.

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

This policies objectives are to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at Hilbre High School.

ROLES AND RESPONSIBILTIES:

It is the responsibility of the Board of Trustees to:

- Ensure the school has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with guidance and legal requirements.
- Monitor the school's compliance with them.

It is the responsibility of the Headteacher, Assistant Headteacher (T&L), the School Business Manager and other Managers involved in recruitment to:

- Ensure that the school operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the school.
- Monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

In accordance with the School Staffing Regulations, the Board of Trustees has delegated responsibility to the Headteacher to lead in all appointments. School Trustees may be involved in staff appointments but the final decision will rest with the Headteacher.

The school will ensure that at least one member of the appointment panel has successfully completed Safer Recruitment Training. This member will be part of the whole recruitment process.

The following procedures and practices are in place to ensure the safe recruitment of staff:

Advertising:

To ensure equality of opportunity, the school will advertise all vacant posts to encourage as wide a field of applicant as possible; normally this entails an external advertisement.

All advertisements for all posts will clearly stipulate the stance adopted by the school by the inclusion of the following Safeguarding Statement:

"Hilbre High School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment".

All documentation relating to applicants will be treated confidentially in accordance with the GDPR.

Application Forms, Job Descriptions and Person Specifications:

Prospective applicants are supplied with the following:

- Application Form;
- Job Description;
- Person Specification;
- Copies of the Safer Recruitment and Safeguarding policies.

Hilbre High School uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role. CVs will not be accepted.

A Job Description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.

The Person Specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The Person Specification will include a specific reference to suitability to work with children.

SHORTLISTING:

At least two people should carry out the shortlisting exercise.

Candidates will be shortlisted against the Person Specification for the post using the short listing proforma (Appendix 1). Gaps in employment should be noted on this form.

After shortlisting has been carried out, shortlisted candidates will be sent a self-declaration form. This will ask questions regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected and possible referral to the police and other professional regulatory bodies.

At this point, the school will also carry out checks to establish the digital footprint of an applicant and may explore this during interview, if appropriate.

REFERENCES:

- Two references, one of which must be from the applicant's current/most recent employer, will be taken up before the selection stage so that any discrepancies may be probed during this stage of the procedure. This applies to all external appointments.
- For internal applicants, a reference from the persons' direct line manager will be requested. The Headteacher will not be required to complete a reference.
- The school does not accept open references, testimonials or references from relatives.
- We will secure a reference from the relevant employment from the last time the applicant worked with children (if not currently working with children).
- References will be sought directly from the referee, and, where necessary, will be contacted to clarify any anomalies or discrepancies. Detailed written records will be kept of such exchanges.
- All references must be written directly to the Headteacher, and we will not accept open references (e.g. to whom it may concern).
- We will ensure electronic references originate from a legitimate source.
- We will contact referrers to verify any information which requires further information or any discrepancies.
- Referees will not be asked about the applicant's health or disability unless the applicant has been offered a job.

Referees will be asked specific questions about the following:

- The candidate's suitability to work with children and young people.
- Any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children and young people.
- The candidate's suitability for the post.

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

INTERVIEWS:

There will be a face-to-face interview, wherever possible, and the same panel will see all the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the Job Description and meet the Person Specification.

Candidates will always be required:

- to explain satisfactorily any gaps in employment;
- to explain satisfactorily any anomalies or discrepancies in the information available to the interviewers; and
- to demonstrate their capacity to safeguard and protect the welfare of children and young people.

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process.

At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training, as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents will only be accepted and photocopies will be taken.

It is good practice to have a Trustee on the panel, and this always be the case for senior posts.

The scoring system will be agreed by the panel before the interview.

EMPLOYMENT CHECKS:

An offer of appointment will be conditional and all successful candidates will be required to:

- Provide proof of identity.
- Obtain an enhanced DBS certificate. If a DBS is returned with notification of a disclosure that the candidate has not declared, the school reserves the right to withdraw the offer of employment. Successful applicants will only be allowed to commence employment once in receipt of the original Enhanced DBS and Barring List Certificate. This must be made available to school.
- Provide proof of professional status (QTS/QTLS/Teacher reference Number TRN number).
- Provide original certificates of qualifications (eg. PGCE, degree, GCSEs, A Levels).
- Complete a confidential health questionnaire. All successful candidates will complete a medical clearance form to be scrutinised by the HR manager. This may be passed to Occupational Health. All issues arising from the medical clearance will be risk assessed.
- Provide proof of eligibility to live and work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment.

In addition, for all teaching staff checks will be made by the school Teaching Regulation Agency.

Any member of staff in a management position, including Trustees, will also have to undergo Section 128 checks, in addition to having an Enhanced DBS. This will be recorded on the Single Central Register (SCR).

We will ensure that new staff are not subject to a prohibition order if they are employed to be a teacher. If appropriate, we may carry out further checks if the person has lived or worked outside the UK, e.g. if there is a break in teaching employment in another country.

All checks will be:

- Confirmed in writing.
- Documented and retained on the personnel file.
- Recorded on the school's SCR.
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

A firm offer of appointment will only be provided when we are in receipt of all checks of employment are completed.

New members of staff will not be able to commence employment at Hilbre until an Enhanced DBS certificate has been received by the school.

Dave White, Assistant Headteacher (Safeguarding) will oversee and maintain a constant vigilance with all matters relating to the SCR, and ensure we are fully compliant at all times. The Trustee linked to safeguarding will also review and sign off the SCR on a termly basis.

INDUCTION:

All newly appointed staff will, either prior to or at the point of taking up the post, undergo a programme of induction appropriate for their post. The induction will specifically address issues concerning the safeguarding of children and young people as well as matters directly related to the operation of the post.

SUPPLY STAFF:

All supply agency staff will have an Enhanced DBS check carried out by the agency. The supply agency will provide the school with the DBS number.

PGCE STUDENTS/VOLUNTEERS:

All ITT students and volunteers or anybody undertaking work experience on site will have an Enhanced DBS clearance before they start. The school must have seen a copy of this. The only exception to this is work experience students who are still at school/college studying Level 2/3 qualifications.

Recruitment Flowchart:

- 1. Assistant Headteacher (T&L)/Business Manager to ensure there is Job Description and Person Specification. Advert written;
- 2. PA to Assistant Headteacher (T&L) to arrange adverts in suitable publications/websites;
- 3. Assistant Headteacher (T&L)/School Business Manager to inform PA of interview date and panel members/tour, etc. Shortlisters agreed.
- 4. PA to liaise with HR/Cover Manager about staffing requirement for interview panel;
- 5. PA to invite a Trustee, if applicable;
- 6. PA to send out confirmation of receipt for applications received electronically;
- 7. Job advert closes;
- 8. PA to email shortlisting form and to distribute the applications to personnel responsible for shortlisting (there should be at least 2 members of staff who shortlist);
- 9. Shortlister informs PA of names on the shortlist;
- 10. PA sends out self-declaration to all shortlisted candidates;
- 11. Digital Marketing Manager to carry out online search out of all shortlisted candidates. This is to identify any incidents or issues that have happened, and are publically available online, which the school might want to explore with the applicant at interview. Appendix 5 should be used. This should be returned to the PA prior to interview.
- 12. For teaching appointments, Assistant Headteacher (T&L) will liaise with the appropriate Progress Leaders to ascertain what the candidates will be teaching, ie. lesson title, year group/set, rooming requirements/name of person conducting the tour;
- 13. PA to invite candidates for interview (initially by telephone and follow up letter/e-mail);
- 14. PA to start to ask for references;
- 15. Interview takes place; candidates are asked to sign original documentation (application form and self-declaration form);
- 16. Headteacher (or Trustee) to offer job (conditional upon receipt of relevant documentation/references if not received);
- 17. Assistant Headteacher (T&L) or lead interviewer completes the green 'Appointment Form' and passes to HR/Cover Manager;
- 18. School Business Manager to give HR/Cover Manager the 'Contract Set Up' Form, and passes this to HR/Cover Manager;
- 19. HR/Cover Manager to issue a letter to new starter providing a conditional or unconditional offer depending on documentation already available;
- 20. HR/Cover Manager to undertake all checks on the 'Verification of Identity' form and cross reference with application form;
- 21. HR/Cover Manager to send the following forms to payroll:
 - Application form;
 - Certificate of Identity form;
 - HRMC starter form;
 - Bank Details form;
 - DBS Certificate (if available at this stage);
 - Copy of any teaching qualifications (Degree, PGCE, QTS/QTLS Certificate);
 - Contract Set Up form;
- 22. HR/Cover Manager to set the new starter up on SIMS/Edulink;
- 23. HR/Cover Manager to liaise with Network Manager, Office Manager, Caretaker, DSL and Pastoral Admin (Year 9) and VPA technician with regards to setting up ICT access arrangements, inVentry setup, MyConcern setup, staff photo, staff tray, fob and lunch card;
- 24. HR/Cover Manager (in their absence PA to Assistant Headteacher T&L) to issue new starter pack, which will include:
 - Staff handbook;
 - Induction checklist/booklet;

- Registration of pecuniary interest form;
- Responsible use of ICT form;
- Social Networking form;
- Health and Safety Information;
- Staff data collection sheet.

If a member of staff joins the school in September, then the PA to Assistant Headteacher will issue:

- Staff handbook;
- Registration of pecuniary interest form;
- Responsible use of ICT form;
- Social Networking form.
- 25. HR/Cover Manager to set up all new starters on The National College.

Pre-Appointment Checklist

Employee Name: _____

Staff Code: _____

For all employees the following checks must be undertaken as part of the safer recruitment process.

Type of check	Completed	Comments
Application form - original signed		
Self-declaration - original signed		
Reference 1		
Reference 2		
Check of qualifications		
Proof of QTS (teachers only)		
Proof of PGCE		
*Prohibition from Teaching Check, including teachers from EEA countries		
Section 128 check for employees appointed to a management post in an Academy		
Identity check as per 'certification of verification of identity form'		
Enhanced DBS check/original certificate seen		
Barred list check		
SCR online updated		
Check to establish the person's right to work in the UK (passport)		
Set up on SIMS/other electronic systems		
Copy of passport uploaded to SIMs		
Medical clearance		
Further checks on individuals who have lived or worked outside the UK		
Notification of Appointment (JDO to initially complete and send to EMI to send to LA)		
Conditional/Unconditional appointment letter sent		
Request ICT/Email logins/ID badge/InVentry		
Register to National College		

Once all the checks have been made and appropriate clearance received, the safer recruitment process requires the information to be input to the school's Single Central Record.

Upon commencement of employment:

Type of check	Requested	Date
Safeguarding training carried out with DWH		
DBS checked by DWH		
Prevent & Safeguarding training Completed via National College		
Health and Safety Induction (with JDO)		
Induction Form completed and returned to EMI/DFE		
Staff handbook, register of pecuniary interest, responsible use		
of ICT form and Social Networking forms		

Appendix 3: Allegations of abuse made against staff (including low level concerns):

Section 1: Allegations that may meet the harms threshold:

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- behaved in a way that has harmed a child, or may have harmed a child, and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our Local Authority Designated Officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of Trustees where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity. Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved:

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives, such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/legal guardians have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations:

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services (the case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services, as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or legal guardians of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or legal guardians of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or legal guardian who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or legal guardian of the child/children involved informed of the progress of the case (only in relation to their child no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises

or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible, the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff:

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The Board of Trustees will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO, as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency, where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies, as necessary, and will invite the agency's HR manager or equivalent to meetings, as appropriate.

Timescales:

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions:

Action following a criminal investigation or prosecution:

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated:

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension:

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports:

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.
- May have been a cry for help, a referral to children's social care may be appropriate.

Unsubstantiated, unfounded, false or malicious allegations:

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing:

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or legal guardians of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping:

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police, as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References:

- When providing employer references, we will:
- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons:

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the Local Authority's Designated Officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations:

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold:

- This Section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in Section 1 above.
 - Concerns may arise through, for example:
- Suspicion

- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent/legal guardian or other adult within or outside the school
- Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children

Definition of low-level concerns:

The term 'low-level' concern is any concern - no matter how small - that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Taking photographs and overly friendly with children.
- Having favourites.
- Pictures of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating students.

Sharing low-level concerns:

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns as per Section 7.7 of this policy.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns:

If the concern is raised via a third party, the Headteacher will collect evidence, where necessary, by speaking:

• Directly to the person who raised the concern, unless it has been raised anonymously to the individual involved and any witnesses.

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Behaviour policy/Code of Conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping:

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Section 1 of this Appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References:

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 4: Specific safeguarding issues:

Children missing from education:

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families.
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation:

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.

- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child Sexual Exploitation:

Child Sexual Exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse:

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate. In particular, Section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse:

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day. This is the procedure where police forces are part of <u>Operation</u> <u>Encompass</u>

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness:

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage):

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM:

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred, include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student already being known to social services in relation to other safeguarding issues
- A girl -
 - > Having difficulty walking, sitting or standing, or looking uncomfortable.
 - > Finding it hard to sit still for long periods of time (where this was not a problem previously).
 - > Spending longer than normal in the bathroom or toilet due to difficulties urinating.
 - > Having frequent urinary, menstrual or stomach problems.
 - > Avoiding physical exercise or missing PE.
 - > Being repeatedly absent from school, or absent for a prolonged period.
 - > Demonstrating increased emotional and psychological needs for example, withdrawal or depression, or significant change in behaviour.
 - > Being reluctant to undergo any medical examinations.
 - > Asking for help, but not being explicit about the problem.
 - > Talking about pain or discomfort between her legs.

Potential signs that a student may be at risk of FGM, include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl -
 - > Having a mother, older sibling or cousin who has undergone FGM.
 - > Having limited level of integration within UK society.
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/legal guardians stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- > Talking about FGM in conversation for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
- Being unexpectedly absent from school.
- > Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.
- The above indicators and risk factors are not intended to be exhaustive.

Forced marriage:

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, ie. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation:

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people.
 - Causes serious damage to property.
 - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website <u>Educate Against Hate</u> and charity <u>NSPCC</u> say that signs a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour - staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in Section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Sexual violence and sexual harassment between children in schools:

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate. In particular, Section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence:

- Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
 - Increased absence from school.
 - > Change in friendships or relationships with older individuals or groups.
 - > Significant decline in performance.
 - > Signs of self-harm or a significant change in wellbeing.
 - Signs of assault or unexplained injuries.
 - Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

> Risk factors which increase the likelihood of involvement in serious violence, include:

- ✓ Being male.
- ✓ Having been frequently absent or permanently excluded from school.
- ✓ Having experienced child maltreatment.
- \checkmark Having been involved in offending, such as theft or robbery.
- Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors:

All visitors will be required to verify their identity to the satisfaction of staff and sign in to our Inventry software. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in on Inventry and have a photo taken. The visitor will wear a visitor's badge. Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

Non-collection of children:

If a child is not collected at the end of the session/day, we will:

- Ensure the child is safe and not left alone.
- Other adults who have Parental Responsibility to the child will be contacted.
- In some circumstances, the child will be taken home by a Senior Leader with the appropriate training and insurance. Another member of staff will accompany them.

Missing students:

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Follow our Absconding Student policy.
- Liaise with relevant authorities.
- Stay in touch with the parent/legal guardian.