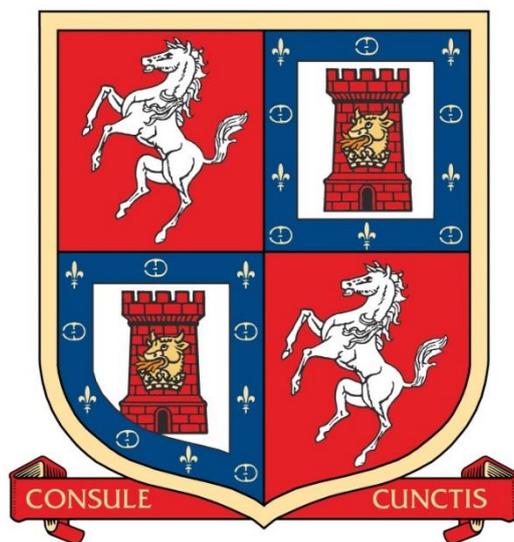


GRAVESEND GRAMMAR SCHOOL



SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

Date Policy Originated/Amended	Date Policy Approved by GGS Governing Body	Signature
August 2014	18 September 2014	J Murray
March 2015	3 March 2015	J Murray
May 2016	9 June 2016	A Robinson
July 2017	4 July 2017	A Robinson
July 2018	3 July 2018	A McLean
November 2019	13 Nov 2019	A Robinson
July 2020	10 July 2020	A Robinson
March 2022	24 March 2022	A McLean
January 2023	24 January 2023	A McLean

An Academy in The Decus Educational Trust

SAFEGUARDING AND CHILD PROTECTION

The School's policy and procedures on safeguarding are based on the government's guidance on "Keeping children safe in education" (New guidance from September 2022). The school adheres to the requirements and recommendations of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) with regard to Child Protection issues and carries out other procedures that are connected and relevant.

Safeguarding should permeate all aspects of school life. Whilst certain areas are the responsibility of senior staff all employees should take responsibility for the protection of students. This policy applies to all staff, governors and volunteers working in the school.

Safeguarding information for all staff:

At Gravesend Grammar School we take a child centred and coordinated approach to safeguarding. Gravesend Grammar school seeks to keep students safe from maltreatment; to prevent impairment of children's health or development; to ensure that children grow up in circumstances consistent with the provision of safe and effective care; and to take action to enable all children to have the best outcomes. Where a child is suffering significant harm, is likely to do so, or is in need of additional support action will be taken to protect that child.

All employees will exercise their responsibilities to provide a safe environment; further to this, teachers will strive to maintain public trust in the teaching profession as part of their professional duties. All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and to take appropriate action, working with other services as needed, and will always act in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. Everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. **All** staff should be prepared to identify children who may benefit from early help and support other agencies and professionals in undertaking an early help assessment. Receiving help at the right time can prevent issues escalating

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

'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms. The school will consider carefully what terminology to use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too.

Basic Procedures:

Gravesend Grammar School fully recognises its responsibilities for child protection. The five main elements to our policy are to:

1. Ensure we practice safe recruitment in checking the suitability of staff and volunteers to work with children
2. Raise awareness of child protection issues, equipping children with the skills to keep them safe
3. Develop and implement procedures for identifying and reporting suspected cases of abuse
4. Support pupils who have been abused in accordance with the agreed child protection plan
5. Establish a safe environment in which children can learn and develop.

We recognise that, because of their day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where children feel secure and are listened to
- Ensure children know that there are adults in the school whom they can approach if worried
- Include opportunities in the personal, social, health and economic (PSHE) curriculum for children to develop the skills they need to recognise and stay safe from abuse.

Gravesend Grammar School will follow the procedures set out by the Kent Safeguarding Children Multi-Agency Partnership and take account of guidance issued by the Department for Education. Information regarding threshold criteria can be found in appendix D. The school will:

- Ensure we have a nominated governor responsible for child protection
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body knows the name of the designated senior person(s) responsible for child protection and their role
- Share information regarding vulnerable children on a need to know basis in the interests of the child.
- Ensure all staff and volunteers understand their responsibilities in recognizing and referring students. This includes an understanding of the need for disclosure.
- Notify Children's Services if there is an unexplained absence of more than two days of a pupil who is on the child protection plan
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at case conferences
- Keep written records of concerns about children, even where there is no need to refer the matter immediately. We will ensure all records are kept securely, using MyConcern and where we receive paper files, they will be stored separately from the main pupil file, and in locked locations

- Ensure safe recruitment practices are always followed and follow procedures where an allegation is made against a member of staff or volunteer

We recognise that the school may be the only stable, secure and predictable element in the lives of children at risk. The school will therefore endeavour to support the pupil through:

- The content of the curriculum
- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- The school behaviour policy
- Liaison with other agencies that support the pupil
- Ensuring that, where a pupil on a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

Staff should recognize that **any** child may benefit from early help but be particularly alert to the potential for early help for a child who: is disabled or has specific additional needs; has SEN; is a young carer; shows signs of being drawn into gangs, criminal or antisocial behaviour; frequently goes missing from home; is misusing drugs or alcohol; is at risk of modern slavery, trafficking or exploitation; has family circumstance presenting challenges e.g. substance abuse, domestic violence, adult mental health problems; has returned home from care; is privately fostered; is at risk of radicalisation.

Roles and Responsibilities

The Head Teacher, the Inclusion Lead, the Heads of Key Stage, and the Assistant Heads of Key Stage are the Designated Safeguarding Leads (DSLs) and have attended the required Training Courses (Modules One & Two). The DSL training will be updated a minimum of every 2 years and their knowledge and skills will be refreshed as required, but at least annually via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments.

The DSLs are responsible for:

- Coordinating safeguarding action for individual children
- Liaising with other agencies and professionals
- Ensuring locally established procedures are followed and making referrals
- Acting as consultants to staff to discuss concerns
- Maintaining a confidential recording system. Recording of all safeguarding will be via 'My Concern'
- Representing or ensuring the school is represented at inter-agency meetings
- Managing and monitoring the school's part in the CAF /Child in need/ Child protection plans

- DSLs should help promote educational outcomes by working closely with teachers and sharing information about their welfare, safeguarding and child protection concerns.

Teaching staff receive annual training. Every year all staff are reminded of the School Advice on Child Protection. All new and temporary teaching staff receive a copy of the School Advice on Child Protection on induction which is a priority upon taking up a position at the school. It is the job of the member of staff in charge of training and the lead member of staff for Child Protection to make sure that staff are trained in Child Protection.

DSLs should refer to the National Police Chief's Council guidance on when to call the police to ensure calls are appropriate and timely.

Raising concerns and Referrals

If staff members have concerns about a child they should raise these with a Designated Safeguarding Lead. All safeguarding concerns should be recorded using MyConcern. The DSL will usually make any decision to refer the concern. If, at any point, there is a risk of immediate danger or serious harm to a child a referral should be made to children's social care or the police immediately. Anybody can make a referral. **If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.** (Appendix B).

If staff members have concerns about another member of staff then this should be referred to the headteacher or the chair of governors. Staff are advised to maintain an attitude of 'It could happen here' where safeguarding is concerned. This should include low level concerns. Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure.

Students can also raise their own concerns regarding safeguarding, mental health, sexual harassment and bullying. This can be done via the school cloud site by click a button and filling in a google form. There are also posters around the school that have a QR code that will allow students to access these buttons. These will be triaged by the DSL and passed on to the appropriate person for action to be taken

The recording of child protection issues are in accordance with recommended procedures. Use is made of the 'Consultation' process with County when advice on courses of action are being considered. Referrals to Children's Social Care will be made using Kent's inter-agency referral form and with reference to the Kent and Medway interagency Threshold Criteria for Children in Need. Where a DSL is unsure of the threshold for referral a telephone phone call will be made to the Early Intervention Team at Kent Children's Social Care. In situations where there are felt to be urgent or grave concerns, a telephone referral will be made prior to the form being completed and sent. All referrals are made via the KELSI Front Door via the Children's Portal. Student Support Staff liaise as appropriate with external agencies to support students and advise agencies of concerns. In all but the most exceptional cases parents / carers will be made aware of the concerns felt for a young person at the earliest

possible stage. The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

Escalation

On occasion, staff may pass information about a child to the DSL, but remain anxious about subsequent action. Staff should be able to clarify with the DSL further progress (without being given confidential information) to reassure themselves that appropriate action is being taken. If they have concerns that they feel are not being dealt with, it is the responsibility of any member of staff to seek further advice from the headteacher. If they are unhappy with the response from the headteacher they may contact the link governor for child protection. If the DSL feels that the matter is not being dealt with appropriately by the Children's Social Care Team or by the lead professional for an ongoing case, then they may escalate or seek further advice from the Area Children's Officer or through a risk management referral to the Risk Management Group.

Concerns about Safeguarding practices

Concerns about unsafe practices or potential failures in safeguarding can be raised through other whistleblowing channels. The NSPCC whistleblowing helpline (0800 028 0285 or help@nspcc.org.uk) is available for staff who do not feel able to raise concerns internally. Departmental advice 'what to do if you are worried a child is being abused – advice for practitioners' provides further advice on understanding and identifying issues.

Specific safeguarding issues

Staff are made aware of the Safeguarding issues that can put children at risk of harm (APPENDIX A). They are reminded that abuse, neglect and safeguarding issues are rarely standalone events which can be covered by one definition or label. In most cases multiple issues will overlap.

All staff are made aware that behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Staff should recognise that children who witness domestic abuse are also victims. Witnessing domestic abuse can have a lasting impact on children. It should be understood that children can be victims, and perpetrators, in their own relationships too. Abuse can be physical, sexual, financial, psychological or emotional.

Safeguarding issues can manifest themselves via **child on child abuse**. This is most likely to include, but not limited to: bullying (including cyberbullying); Physical abuse such as hitting, kicking, shaking, biting, pulling hair or otherwise causing physical harm; sexual violence and sexual harassment (see Part 5 KCSIE 2018); sexting (youth produced sexual imagery); and initiation / hazing type violence and rituals. Child on child abuse now also includes 'up skirting' (up skirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm).

Child on child abuse will not be tolerated or passed off as 'banter' or 'part of growing up'. Instances of peer to peer abuse will be investigated and dealt with in line with the school behaviour and discipline policy. Victims, perpetrators and any others affected will be supported. The nature of this support will be decided on a case by case basis and involve the school pastoral teams and outside agencies as necessary.

Children missing from education at Gravesend Grammar school will be considered and addressed in line with departmental guidance 'Children Missing Education'. Gravesend Grammar School keeps an attendance register which is regularly checked for poor attendance and associated patterns. Poor attendance is dealt with in combination with parents and any necessary outside agencies. Reporting duties are carried out in line with the aforementioned guidance.

As specific safeguarding issues become prominent on the national agenda, Gravesend Grammar School will raise awareness of these with staff and, where appropriate, students and their parents /carers. Current priorities include; Child Sexual Exploitation, Gang related activity including grooming and vulnerability to involvement in County Lines, so called Honour based violence including Female Genital Mutilation (also forced marriage and practices such as breast ironing) and Preventing Radicalisation. (Appendix F) Staff will also need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Staff should also be aware of the associated risks and understand the measures in place to manage them. Staff should also be aware of when mental health concerns become a safeguarding concern. If staff are not sure then they should ask a DSL for advice.

Gravesend Grammar School has an important role to play in supporting the mental health and well-being of their pupils" there are clear systems in place and processes to identify these needs, and consideration should be given as to when they become a safeguarding concern. DSLs should familiarise themselves with the guidance on Mental health & behaviour in schools

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the **teacher** must report this to the police

Safeguarding incidents can be associated with factors outside of school. All staff but particularly the DSL's should be considering the context within which such instances occur contextual safeguarding. Children may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence

When making assessments or referring to children's social services as much contextual information should be provided as is available.

The management of safeguarding:

At Gravesend Grammar School the Inclusion Lead will lead on safeguarding. There is at least two Designated Persons in each Key Stage who will liaise with the Inclusion Lead on

safeguarding issues. The Local Governing Body also has a Governor appointed to take an overview of the arrangements. The Headteacher will take overall responsibility for Safer Recruitment.

Staff training

All staff members will be made aware of systems within the school which support safeguarding as part of staff induction. This includes: the school child protection policy, the role of the designated safeguarding lead, School behaviour policy, children missing in education and guidance on staff conduct including acceptable use of technology, staff/pupil relationships and use of social media. All staff members will receive safeguarding training which is regularly updated. This will include advice on recognising the signs of different sorts of abuse and neglect (Appendix A). Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. The Kent Safeguarding Children Multi-Agency Partnership (KSCMP) will also be able to provide advice on safeguarding issues. We've used The Education People for a desktop review of our safeguarding processes. They can also provide training and support.

Opportunities to teach safeguarding; PSHE

There are many issues of safeguarding that require addressing either through the PSHE programme or via assemblies e.g. Personal safety, Substance abuse. In addition, reminders regarding these matters need to be issued through re-visiting topics via PSHE, Assemblies, Email, posters and notices.

The programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackles issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, 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

The PSHE programme endeavours to instil a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The PSHE Co-ordinator is responsible for providing schemes of work and resources to address the statutory and additional desirable elements of child protection and safety. It is the responsibility of the respective Heads of School and the Inclusion Lead to liaise with the PSHE Co-ordinator and check that the programmes deliver appropriately.

Online Safety

The school recognises Online Safety as a key concern in the 21st Century. The school will do everything it reasonably can to create systems and filters to help students safely use ICT. However, the school also recognises the need to encourage the safe use of ICT beyond the school gates. The school will apply the DfE guidance on [teaching online safety in schools](#).

The school has a separate Online Safety policy. Staff and students are required to recognise acceptable use agreements when joining the school.

Allegations of abuse and safeguarding concerns

Procedures for managing allegations against school staff are set out in later sections of this policy (Allegations of abuse made against teachers and other staff).

Staff should recognise that children are capable of abusing their peers and that this can manifest itself in many ways (see *specific safeguarding issues*). When dealing with incidents of Sexting the school will refer to departmental advice 'searching, screening and confiscation' and the UKCCIS document 'sexting advice for schools and colleges'

Safer recruitment

Gravesend Grammar School has procedures in place that help identify and deter or reject people who might abuse children. These include criminal record checks (DBS checks), barred list checks and prohibition checks. For most appointments, an enhanced DBS check with barred list information will be appropriate as the majority of staff will regularly work at GGS; be responsible, on a regular basis, for supervision of children; or will regularly come into contact with children under 18 years of age. (Appendix C).

GGs will always require written references (not 'open' references or testimonials) from previous employers or educational institutions prior to employment. The school will also establish a full employment and educational history ensuring that any concerns are resolved before employment is confirmed.

The school will only accept copies of curriculum vitae (CV) alongside an application form (a CV on its own won't provide adequate information)

Prior to employment further checks will be carried out including

- Verification of identity via current photographic ID and proof of address except where, for exceptional reasons, none is available
- Verification of the person's right to work in the UK
- Verification of professional qualifications, as appropriate

- The school will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online

Single central record

Gravesend Grammar School keeps a single central record which covers:

All staff who work at GGS providing education to children; all others who work in regular contact with children, including volunteers and the Local Governing Body. The information to be recorded on these individuals is whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed:

- an identity check;
- a barred list check;
- an enhanced DBS check;
- a prohibition from teaching check;
- further checks on people living or working outside the UK;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

Agency and third-party staff

GGs will obtain written notification from any agency, or third-party organisation, they use that the organisation has carried out the checks on an individual who will be working at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by GGS the school will ensure that all necessary checks are carried out and that they will include an enhanced DBS certificate and barred list check. Where trainee teachers are fee-funded it is the responsibility of the initial teacher training provider to carry out the necessary checks. In the case of the Thames Teaching Alliance the school will carry out the checks on their behalf.

Existing staff

If there are concerns about an existing staff member's suitability to work with children, GGS will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity will be carried out. **Schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.**

Volunteers

Volunteers in respect of whom no checks have been obtained will not be left unsupervised with students. New volunteers in regulated activity who will regularly teach or look after children on an unsupervised basis will be DBS and barred list checked. For new volunteers not in regulated activity GGS will obtain an enhanced DBS certificate.

Governors

Members of Local Governing Bodies must have an enhanced DBS check without a barred list check. If they act as a volunteer they will be treated on the same basis as other volunteers.

Contractors

Contractors, or their employees, must have an appropriate level of check if one is required. The identity of contractors should be checked on arrival.

Allegations and safeguarding concerns of abuse made against teachers or other staff

Gravesend Grammar school has an approach that recognises concerns tend to grow and may be apparent before someone makes an allegation.

If allegations that current employees

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

If allegations are made, even if the allegations are historical, then the following procedures should be used. Allegations against a teacher who is no longer teaching at Gravesend Grammar School should be referred to the police.

Low level concerns should also be reported to the Headteacher / DSL. Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. The headteacher is the ultimate decision-maker in respect of all low-level concerns, although they may wish to consult the DSL to take a more collaborative approach. If there is any doubt as to whether a low-level concern meets the harm threshold, the Headteacher / DSL will consult the local authority designated officer (LADO)

Investigations should be carried out as quickly as possible. The Local Authority Designated Officer (LADO) should be informed of all allegations that come to a school's attention and

appear to meet the criteria so they can consult police and Children's Social Care services as appropriate. Following discussion, a course of action will be determined.

The following definitions should be used when determining the outcome 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;

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

The Headteacher should inform the accused person about the allegation as soon as possible after consulting the LADO. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school. All options to avoid suspension should be considered prior to taking that step.

Supporting those involved

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. They should act to manage and minimise the stress inherent in the allegations process. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in the school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the Children's Social Care or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. However, where a strategy discussion is required, or police or Children's Social Care need to be involved, information will only be disclosed after appropriate consultation. Parents and carers should also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be advised to seek legal advice.

Confidentiality

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Headteacher should take advice from the LADO, police and Children's Social Care to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Managing the situation and exit arrangements

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up. A referral to the DBS *must* be made, if the criteria are met (see paragraph 73 of KCSIE Guidance) and it will not be appropriate to reach a settlement/compromise agreement. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it.

So-called 'settlement/compromise agreements', by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

Timescales

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below:

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the school to deal with it, although if there are concerns about child protection, the school should discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the school should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Oversight and monitoring

The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with the Local Safeguarding Children's Partnership (LSCP) on the subject. The LADO will provide advice and guidance to the school, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

The school will manage allegations against supply teachers to ensure allegations are dealt with appropriately when they are not the employer. Schools cannot simply cease to use this teacher. Processes are in place to manage this within the disciplinary procedure and the school will advise supply agencies of its process for managing allegations.

Gravesend Grammar school will work with other agencies to investigate any allegations when somebody who has worked at the school has "behaved or may have behaved in a way that indicates they may not be suitable to work with children".

Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the school to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious that it might be grounds for dismissal.

The school should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- 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 to alternative work in the school so the individual does not have unsupervised access to children;
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school in the Trust where this is appropriate and not affecting the students' education

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

The power to suspend is vested in the governing body of the school.

Specific actions

Following a criminal investigation or a prosecution:

The police should inform the employer and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances the LADO should discuss with the school whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or Children's Social Care should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

In respect of malicious or unsubstantiated allegations:

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to the Children's Social Care to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

Child on Child sexual violence and sexual harassment

The starting point regarding any report is that sexual violence and sexual harassment is not acceptable and will not be tolerated

Reports of sexual violence and sexual harassment are likely to be complex and require decisions to be made on a case by case basis with the DSL taking a lead role. Further advice can be found at <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>.

Responding to reports of sexual violence and sexual harassment

The initial response to a report is important. It is essential that **all** victims 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 they are creating a problem nor be made to feel ashamed to have made a report.

There is a zero-tolerance approach to sexual violence and sexual harassment, to ensure that there is not a culture of unacceptable behaviour and in the worst-case scenario, a culture that normalises abuse

It is important to recognise that even if there are no reports, it doesn't mean it's not happening.

Physical behaviours (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Staff should recognise that dismissing or tolerating such behaviours risks normalising them

Harmful sexual behaviour (HSB)

- HSB can occur online and/or face-to-face and can also occur simultaneously between the 2
- Both the ages and stages of development of the children are critical factors
- Children displaying HSB have often experienced their own abuse and trauma, and it's important they're offered appropriate support

As with all other safeguarding and child protection reports confidentiality should not be promised at this stage, it is likely that concerns will have to be referred further, however information should only be shared with staff necessary to progress it. Staff should follow the

same procedures of listening and recording information as for all safeguarding concerns and as is outlined in staff training and documentation. Where the report includes an online element staff should be aware of searching, screening and confiscation advice (<https://www.gov.uk/government/publications/searching-screening-and-confiscation>) and UKCCIS sexting advice (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf). **The key consideration is for staff not to view or forward illegal images of a child.** If possible, reports should be managed with 2 members of staff present, preferably one of whom would be the DSL (inform DSL as soon as possible afterwards if not present at report)

When the report is of sexual violence the DSL should make an immediate risk and needs assessment. This should include:

- the victim, especially protection and support
- the alleged perpetrator; and
- all the other children and adults especially if actions are appropriate to protect them.

Risk assessments will be recorded and kept under review. Where sexual violence is reported it is likely that professional risk assessments by social workers or sexual violence specialist will be needed. DSL should liaise with specialist services in order to facilitate this.

Action following report of sexual harassment and/or sexual violence

Important considerations:

- wishes of the victim (as far as is reasonably possible)]
- the nature of the alleged incident
- the ages of the children
- the developmental stages of the children
- any power imbalance between the children
- is the allegation a one-off incident or pattern of abuse?
- Ongoing risks to the victim, other children or adults
- Wider context and related issues.

Whilst the school establishes the facts of the case and where appropriate starts the liaison process immediate consideration will be given to proximity of the victim and alleged perpetrator regarding shared classes, school premises and journeys to and from school. This is in the interest of both parties and should not be perceived as a judgement of guilt of the alleged perpetrator.

Managing the report

Decisions on managing the report will be taken on a case by case basis and may include: managing internally e.g. one-off incidents of sexual harassment; Early Help to promote welfare and prevent harmful sexual behaviour escalating to sexual violence; referrals to Children's Social Care when a child has been harmed or is in immediate danger or; reporting to the police e.g. if the report is of rape, assault by penetration, or sexual assault.

In the case of criminal process

Should a child be part of a criminal process (Released under investigation or with bail conditions) the school will work with Children's Social Care the Youth Offending Service and police to manage any implications and safeguard children whilst ensuring the victim can continue their normal routine, including continuing to receive a suitable education.

Should there be delays to the criminal process the school will not wait for an outcome but will use the risk assessment outlined earlier to protect the victim, alleged perpetrator and other children. The DSL will liaise as appropriate with the police to avoid jeopardising the police investigation.

If a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place for all children at the school. Regardless of outcome the school will ensure that victim and (alleged) perpetrator will remain protected from bullying or harassment and will be supported for as long as is necessary.

Ongoing response

Support for all parties will be considered on a case by case basis and support arrangements will remain in place for as long as is necessary. Where necessary outside agencies may be engaged to assist this process. Consideration will always be given to two key factors: firstly, the need to safeguard children; and secondly, the school's duty to provide a suitable education. The best interests of the children will always come first.