



# MK Christian Foundation

Growing people and community through social enterprise

## **Child protection and safeguarding policy and procedures**

MK Christian Foundation

Child Protection and Safeguarding Policy

Status :	Statutory
Date of next revision :	August 2022
Reviewed and monitored by:	Debbie Brooks and Steve Johnstone
Approved by :	Board of Trustees

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#### Named staff/personnel with specific responsibility for Child Protection

Academic Year	Designated Senior Lead & Deputy DSL	Nominated Trustee
2021-2022	<b>Debbie Brooks - Main DSL</b> <b>Steve Johnstone – Deputy DSL</b>  Laura Geering – DSL  Stephen Norrish – Director (where allegations are made against the DSL)	Jenny Mills (will report to the LADO where an allegation is made against the director)

**Training for Designated Staff in School** (DSLs should refresh their training every 2 years KCSIE 2021)

#### Definitions used throughout this policy

<b>MKCF</b>	<b>MK Christian Foundation</b>
<b>Child</b>	<b>0-18 years</b>
<b>Young Adult</b>	<b>18-25 years</b>
<b>LADO (Designated Officer)</b>	<b>Local Area Designated Officer</b>
<b>MARF</b>	<b>Multi Agency Referral Form</b>
<b>CAF</b>	<b>Common Assessment Framework</b>

<b>DSL</b>	<b>Designated Safeguarding Lead</b>
<b>MASH</b>	<b>Multi Agency Safeguarding Hub</b>
<b>CoN</b>	<b>Continuum of Needs</b>
<b>LA</b>	<b>Local Authority</b>
<b>Staff and Volunteers</b>	<b>Anyone working for an organisation, paid or unpaid</b>
<b>DBS</b>	<b>Data Barring Service</b>
<b>Barring service (was List 99)</b>	<b>Barred or restricted list of names barred or restricted from working with children and young people.</b>
<b>Case Manager</b>	<b>Professional in charge of the safeguarding case</b>
<b>Parent/Carer</b>	<b>Responsible adult for the child or young person</b>
<b>LAC</b>	<b>Looked After Child</b>
<b>Upskirting</b>	<b>Taking pictures of underwear or genital areas under skirts.</b>
<b>Hazing</b>	<b>Hazing</b> is any action taken or any situation created intentionally that causes embarrassment, harassment or ridicule and risks emotional and/or physical harm to members of a group or team, whether new or not, regardless of the person's willingness to participate

- A. Whole School Child Protection Training** (all staff should receive induction and "regular" updated training KCSIE 2021) Milton Keynes Safeguarding Children Board Best practice guidance for education states that minimally this should be every 3 years and best practice is annually.
- B. Safer Recruitment Training** in line with KCSiE 2021 at least one person on any recruitment and selection panel has to have undertaken Safer Recruitment training (MKC recommends this is updated every 5 years)

**Who is available within the Local Authority to offer advice and support?**

LADO (Jo Clifford)	01908 254300.
MARF form	MK Council website
MK Safeguarding Children Board (MASH)	For advice call 01908 253169 Report forms (MARF) on MK Council website
Out of area safeguarding contacts	See appendix One
Prevent	0207 340 7264
FGM	0800 0283 550
Channel Helpline	0207 340 7264
NSPCC	0808 800 5000
Childline	0800 1111

## 1. Aims

MK Christian Foundation 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

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#). We comply with this guidance.

This policy is also based on the following legislation:

- Section 157 of the [Education Act 2011](#), which places a duty on education providers and local authorities to safeguard and promote the welfare of trainees.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM. Under [Serious Crime Act 2015](#), educators have a duty to report to police where they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18 years of age.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains education providers' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

## 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- 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. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one 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 carer 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 cyberbullying), 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 non-penetrative 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.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

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

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

- Provide adequate food, clothing 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 needs.

Children include everyone under the age of 18. This includes young people up to the age of 25 with an EHCP at MK Christian Foundation.

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:

- The local authority (LA).
- A clinical commissioning group for an area within the LA.
- The chief officer of police for a police area in the LA area.

#### **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:**

- 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.

(The most common reason for children becoming looked after by the local authority is a result of abuse and/or neglect. Relevant staff should ensure that they obtain the necessary information they need in relation to a child's looked after legal status and the child's contact arrangements with birth parents or those with parental responsibility. Staff should also ensure they have information about the child's care arrangements and the level of authority delegated to the carer by the authority looking after him/her. This information is held by the DSL and Welfare Coordinator.)

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure unless it would put the child at further risk of harm.

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

If we believe that notifying the parents 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 of all the children involved unless it would put the children at risk of further harm.

## 5. Roles and responsibilities

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

### 5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2021](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the role and identity of the designated safeguarding lead (DSL), Deputy DSL and other Safeguarding Team members, the Trainee Agreement, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL either in person, telephone or email at [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk).
- 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. Referrals can be made by any staff, volunteer or Trustee, however this should be done with the knowledge of the DSL and a record sent to them of the referral report. Upon completion of a MARF you receive confirmation and a copy of this which must be forwarded to [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk).
- 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 sexual exploitation (CSE), FGM and radicalisation.

## **5.2 The Designated Safeguarding Lead (DSL)**

Our DSL is Debbie Brooks. The DSL takes lead responsibility for child protection and wider safeguarding.

Members of the Safeguarding Team are available during working hours for staff to discuss any safeguarding concerns.

Please contact members of the Safeguarding Team by emailing [safeguarding@mkchristianfoundaion.co.uk](mailto:safeguarding@mkchristianfoundaion.co.uk) There will always be a Team member on site. Team members are: Deputy DSL Steve Johnstone, other team member is Laura Geering,

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.

The DSL will also keep the Head of Learning and Director informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and Deputy DSL are set out in their job description.

Outside of school hours/term time, direct referrals to Children's Social Care can be made by telephoning the duty team at MK Council on 01908 253169.

## **5.3 The Board of Trustees**

The Board of Trustees will approve this policy at each review, ensure it complies with the law and hold the Director to account for its implementation.

The Board of Trustees will appoint a link trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL.

The chair of the Board of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Director, where appropriate.

All trustees will read Keeping Children Safe in Education part 1 2021.

## **5.4 The Director**

The Director 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.
- Communicating this policy to parents when their child or young person joins MK Christian Foundation and via the MK Christian Foundation 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 update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

## 6. Confidentiality

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of child protection.

The basic principles of information sharing are the 7 Golden Rules of Information sharing (Data Protection Act 1998 (2018))

Staff will be reminded on a regular basis of the 7 Golden Rules and within child protection training and regular updates during staff meetings, will be informed that they must never promise to keep secrets, that if a child asks them to keep a secret they will tell them that they cannot keep secrets and that any information that indicates that they or another child or adult is being harmed or is at risk of being harmed will be shared with DSL's named within this policy. All information should be shared in a timely fashion for effective safeguarding to take place and on a 'need to know' basis.

Professionals can only work together effectively, to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. Any disclosure of personal information to others, [including Children's Social Care Services], must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998, European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. If staff need to share '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 or if it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

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 GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe.

*In some circumstances, consent may not be possible or desirable but the safety and welfare of a child dictate that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy) as soon as possible, in a timely manner.*

## 7. Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### 7.1 If a child is suffering or likely to suffer from 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 in immediate danger. **Anyone can make a referral but the DSL must be informed as soon as possible.**

To refer a concern to Children's Social Care you can telephone the duty team at MK Council on 01908 253169. The MARF can be found on MK Council website.

Email the Safeguarding Team on [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk) as soon as possible if you make a referral directly, forwarding the email you get in response..

### 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

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

- Tell the child they have done the right thing in telling you. Do not tell them they should have informed someone 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.
- Email the disclosure to the Safeguarding Team via [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk) alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so with a copy of the report if referred this way.

**Staff should never:**

- Do nothing/assume that another agency or professional will act or is acting.
- Attempt to resolve the matter themselves, the process in MK Christian Foundation is that all concerns are reported to the DSL's.

### **7.3 If you discover that FGM has taken place or a trainee is at risk of FGM**

The Department for Education's Keeping Children Safe in Education 2021 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 trainee has already been subjected to FGM, and factors that suggest a trainee may be at risk, as set out below.

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.

Indicators that FGM has already occurred include:

- A trainee confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/trainee 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 trainee 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 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.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a trainee under 18 or before their 18<sup>th</sup> birthday must immediately report this to the police, personally. This is a statutory duty, and staff will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Volunteers’, trustees’ or other staff who discovers that an act of FGM appears to have been carried out on a trainee under 18 or before their 18<sup>th</sup> birthday must speak to the DSL and follow our local safeguarding procedures.

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

Any member of staff who suspects a trainee is *at risk* of FGM or suspects that FGM has been carried out must speak or email the Safeguarding Team via [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk) and follow our local safeguarding procedures.

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

The diagram on page 13 illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak or email the DSL first to take action on [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk)

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 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.

Make a referral to local authority children’s social care directly; if appropriate. Share any action taken with the DSL as soon as possible.

**Early help**

If early help 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 DSL will keep the case under constant review and MK Christian Foundation 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.

The Early help process, in Milton Keynes it is called ‘Common Assessment Framework’ (CAF).

## Referral

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

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within 48 hours 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 referral is not made by the DSL they must be informed of the outcome.

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.

### What should the DSL consider right at the outset?

- Am I dealing with 'risk' or 'need'? (By definition, a child at risk is also a child in need. However, what are the *priority / level and immediacy* of risk/need?)
- Can the level of need identified be met:
  - By working with the child, parents, colleagues and other agencies that can be referred to or are already working with the child?
- What resources are available to me / MK Christian Foundation and what are their limitations?
- Is the level of need such that a referral needs to be made to Children's Social Care which requests that an assessment of need be undertaken?
- Is the level and/or likelihood of risk such that a child protection referral needs to be made (i.e. a child is suffering or is likely to suffer significant harm?)
- What information is available to me: Child, Parents, Family and Environment?
- What information is inaccessible and, potentially, how significant might this be?
- Who do/don't I need to speak to now and what do they need to know?
- Where can I access appropriate advice and/or support? (MASH on 01908 253 169)
- If I am not going to refer, then what action am I going to take? (e.g. CAF, time-limited monitoring plan, discussion with parents or other professionals, recording etc.)

## 2. Feedback to Staff Who Report Concerns to the Designated Safeguarding Lead

Rules of confidentiality dictate that it may not always be possible or appropriate for the Designated Safeguarding Lead to feedback to staff who report concerns to them. Such information will be shared on a 'need to know' basis only and the Designated Safeguarding Lead will decide which information needs to be shared, when and with whom. The primary purpose of confidentiality in this context is to safeguard and promote the child's welfare. The child's Risk Mitigation form will be updated as far as confidentiality will allow.

## 3. Thresholds for Referral to Children's Social Care (CSC)

Where a Designated Safeguarding Lead or back up considers that a referral to CSC may be required, there are two thresholds for (and their criteria) and types of referral that need to be carefully considered:

### i. Is this a Child In Need?

Under section 17 (s.17 (10)) of the Children Act 1989, a child is in need if:

- a. He is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
- b. His health or development is likely to be impaired, or further impaired, without the provision of such services;
- c. He is disabled.

### ii. Is this a Child Protection Matter?

Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are

informed that a child who lives or is found in their area:

1. is the subject of an Emergency Protection Order;
2. is in Police Protection; or where they have
3. reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

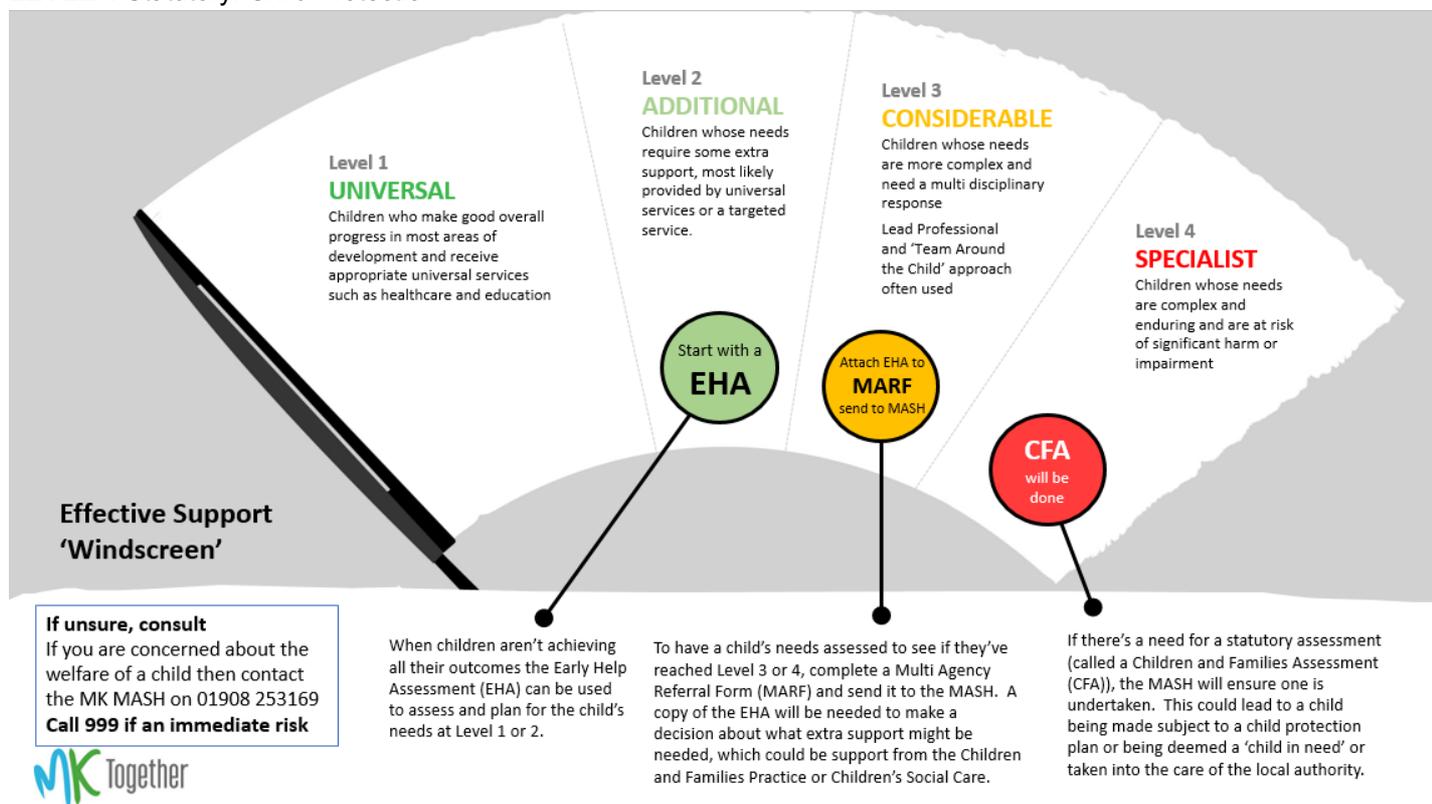
Therefore, it is the 'significant harm' threshold' that justifies statutory intervention into family life. A professional making a child protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm

The Designated Safeguarding Lead will make judgements around 'significant harm', levels of 'need' and when to refer.

## 8. Making Referrals to CSC (Guidance for the Designated Safeguarding Lead)

The Milton Keynes CoN provides 4 levels to described family circumstances

- **LEVEL 1** Universal
- **LEVEL 2** Early Help
- **LEVEL 3** Statutory: Child In Need
- **LEVEL 4** Statutory: Child Protection



### If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

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 and make a referral to local authority children's social care directly, if appropriate.

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.

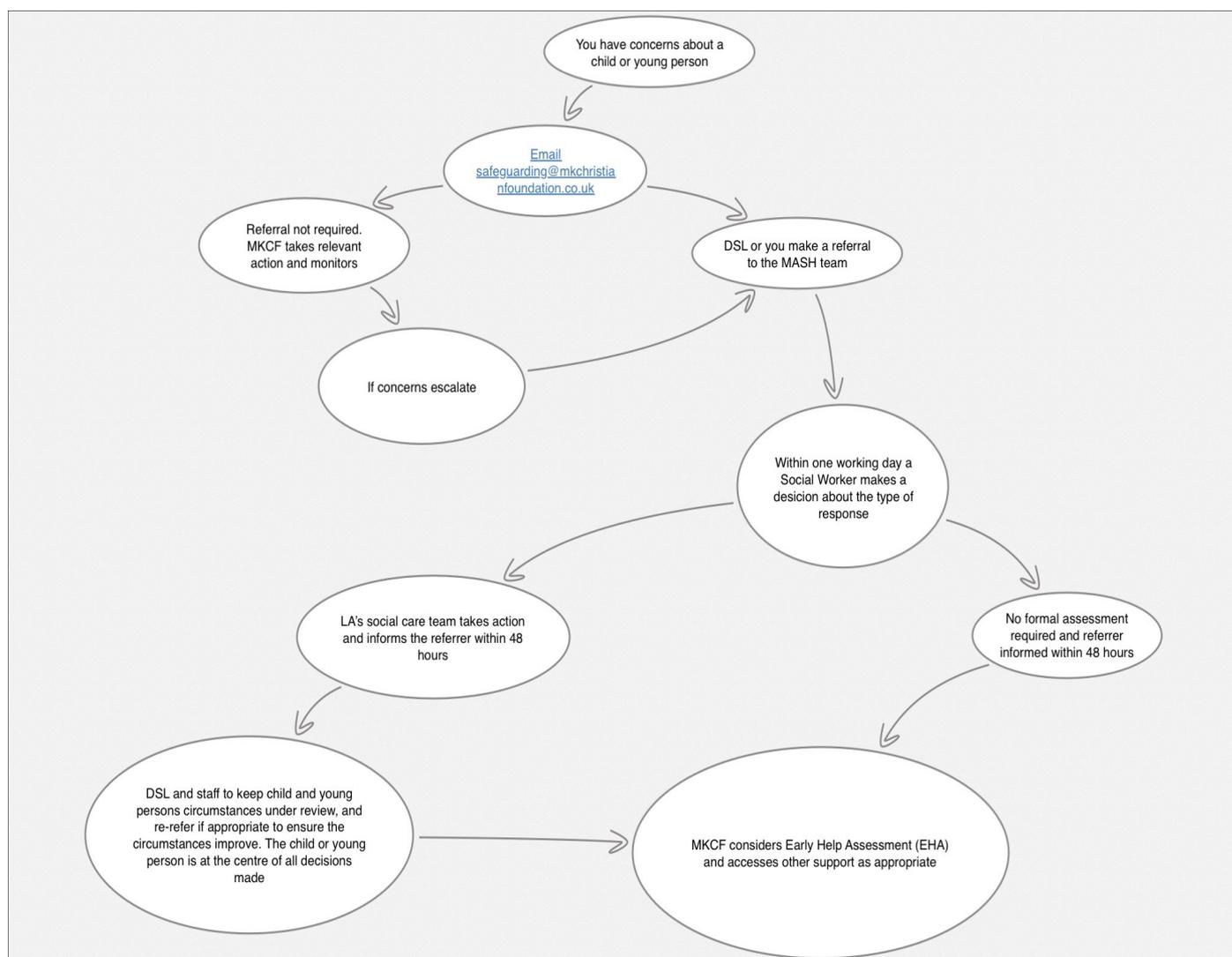
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which MKCF staff and trustees can call to raise concerns about extremism with respect to a trainee. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is 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.

**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.)



**Concerns about a staff member or volunteer**

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the DSL or Director if it is against the DSL. If the concerns/allegations are about the Director, speak to the chair of trustees.

The DSL/Director/chair of trustees will then follow the local procedures, if appropriate.

**Allegations of abuse (bullying) made against other trainees. (Peer on Peer Abuse.)**

We 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”.

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of trainees hurting other trainees will be dealt with under our 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 trainees in MK Christian Foundation at risk.
- Is violent.
- Involves trainees being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting and upskirting).

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

- You must record the allegation and tell the DSL but do not investigate it.
- 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.
- The DSL will contact the MK Multi Agency Safeguarding Hub (MASH), if appropriate. We will

minimise the risk of peer-on-peer abuse by:

- Challenging and taking appropriate action on any form of derogatory or sexualised language or sexualised behaviour, including requesting or sending sexual images and upskirting.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female trainees, and initiation or hazing type violence with respect to male trainees. These issues are not always gender specific but often happen the way stated previously.
- Ensuring our curriculum helps to educate trainees about appropriate behaviour and consent. This is done during trainee induction and reinforced by project staff throughout the trainees' episode of learning.
- Ensuring trainees know they can talk to staff confidentially by regularly highlighting this during enterprise morning meetings.
- Ensuring staff are trained to understand that a trainee 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.

## Sexting

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately, either by speaking to them or via email at [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk).

You must **not** (as this is the DSL's responsibility):

- View, download or share the imagery yourself, or ask a trainee to share or download the image  
If you have already viewed the imagery by accident (if the trainee has shown you before you can stop them), you must report this to the DSL.
- Delete the imagery or ask the trainee to delete it
- Ask the trainee(s) who are involved in the incident to disclose information regarding the imagery. Share information about the incident with other members of staff, the trainee(s) it involves or their parents and/or carers (except LA).
- 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 trainee(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 meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to trainee(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed). ask the young person to screenshot and save the images to their own device to ensure they can be viewed should childrens' social care or the police need to.
- What further information is required to decide on the best response.

- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown). Can we ask the young person to report it to the online platforms that they know it is on.
- Whether immediate action should be taken to delete or remove images from devices or online services. Can we ask the young person to report it to the online platforms that they know it is on?
- Any relevant facts about the trainees involved which would influence risk assessment.
- If there is a need to contact another school, college, setting, individual or LA.
- Whether to contact parents or carers of the trainees involved (in most cases parents 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 imagery 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 child in the imagery is under 13.
- The DSL has reason to believe a trainee is at immediate risk of harm owing to the sharing of the imagery (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 Director and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

#### **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.

They will hold interviews with the trainees involved (if appropriate), to establish the facts and assess the risks.

If at any point in the process there is a concern that a trainee 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**

The DSL will inform parents 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 trainee at risk of harm.

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done by contacting 101 and discussing appropriate next steps.

#### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements also apply to recording incidents of sexting. Curriculum coverage

Trainees are taught about the issues surrounding sexting as part of the induction process, including

- 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.
- Issues of legality.
- The risk of damage to people's feelings and

reputation.

- Trainees also learn the strategies and skills needed

to manage:

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

## **9. Trainees with special educational needs and disabilities (SEND)**

We recognise that trainees with special educational needs and disabilities (SEND) can face additional safeguarding challenges. 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 disability without further exploration.
- Trainees being more prone to peer group isolation than other trainees.
- The potential for trainees with SEND being disproportionately impacted by the behaviour of others such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- Extra pastoral support is offered to students with SEND, concerns that may be an indicator of abuse, such as an incident of poor behaviour is explored with a member of the DSL team as well as Welfare Support.

## **10. Mobile phones and cameras**

Staff are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when trainees are not present. Staff members' personal phones will remain out of sight.

Staff will not take pictures or recordings of trainees on their personal phones or cameras.

*Any images or recordings on company devices must be deleted before the device is taken home.*

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use at MK Christian Foundation.

## **11. Complaints and concerns about school safeguarding policies**

### **11.1 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.

### **11.2 Other complaints**

Formal complaints should be made in writing to the Director in the first instance.

### **11.3 Whistle-blowing**

Concerns regarding the DSLs' should be directed to the Director. Concerns regarding the Director should be made to [jenny.mills@mkchristianfoundation.co.uk](mailto:jenny.mills@mkchristianfoundation.co.uk)

### **11.4 Allegations against staff**

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child(ren) in a way that indicates he or she would pose a risk of harm to children.

It applies regardless of whether the alleged abuse took place at MK Christian Foundation or not. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

Our procedures for dealing with allegations will be applied with common sense and judgement.

## **Suspension**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child(ren) is/are at risk of harm, or the case is so serious that it 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 MK Christian Foundation so that the individual does not have direct contact with the child(ren) concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in MK Christian Foundation so that they do not have unsupervised access to children.

#### **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 that there has been a deliberate act to deceive.
- **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 Director (or chair of trustees where the Director is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree on 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 MK Christian Foundation 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.
- **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 provided with a named contact at MK Christian Foundation 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 MK Christian Foundation 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 carers 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 carers of the requirement to maintain confidentiality about any allegations made against teachers/staff, including volunteers, (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the child(ren) involved informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- 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.

If MK Christian Foundation 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 working, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing board 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 at MK Christian Foundation's disciplinary process, should this be required at a later point.

### **Timescales**

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

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer 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 MK Christian Foundation ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager will discuss with the designated officer whether to 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 case manager will discuss with the designated officer 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(ren) who made the allegation, if they are still attending MK Christian Foundation.

#### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Director, or other appropriate person in the case of an allegation against the Director, will consider whether any disciplinary action is appropriate against the trainee(s) or parent/carer who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a trainee.

### **Confidentiality**

MK Christian Foundation 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 local authority's designated officer, 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 carers of the child(ren) 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. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, MK Christian Foundation will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Learning lessons

After any cases where the allegations are *substantiated*, we 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 MK Christian Foundation'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.

## 12. Record-keeping

We will hold records in line with our records retention schedule accessible by DSLs'.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing and emailed to [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk). If you are in any doubt about whether to disclose something, discuss it with the DSL.

Non-confidential records will be easily accessible and available via the risk mitigation forms. 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 MK Christian Foundation. All records will be hand delivered to the next education provider and signed for where reasonable or posted, recorded delivery, if out of the local area.

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 education provider and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

## 13. Training

### 13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including whistle-blowing procedures, to ensure they understand MKCF's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent (completed online), 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 (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training as arranged by the director, Stephen Norrish.

### **13.2 The DSL and Safeguarding Team members**

The DSL and Safeguarding Team members 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.

### **13.3 Trustees**

All trustees receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities as arranged by the director, Stephen Norrish

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 Director, they receive training in managing allegations for this purpose.

### **13.4 Recruitment – interview panels**

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

### **13.5 Staff who have contact with trainees 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.

## **14. Monitoring arrangements**

This policy will be reviewed **annually** by Debbie Brooks, DSL & Deputy DSL Steve Johnstone. At every review, it will be approved by the full governing board.

## **15. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour Policy
- Anti-Bullying Policy
- Complaints Policy
- Health and Safety Policy
- Equality and Diversity Policy.

These are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2021. Safer Recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in MK Christian Foundation's single central record (SCR) for staff and volunteers. Trainees working with vulnerable groups will have their DBS's held by Childcare Pathways. Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

## **16. Staff, Volunteers and Contractors**

### **New staff**

When appointing new staff, we will follow safer recruitment procedures by :

- Verify their identity.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including

barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months.

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be enterprise staff.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

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

**Regulated activity** means a person who will be:

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

#### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

#### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

#### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at MK Christian Foundation has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

### **Trustees**

All trustees will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All proprietors, trustees, local trustees and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

Where we place a trainee with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise trainees on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a trainee under 16 (ET Contract) on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **17. 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.

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 sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs 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.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

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.

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.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections or becoming pregnant.
- Displaying inappropriate sexualised behaviour.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and/or alcohol.
- Going missing for periods of time, or regularly coming home late.
- Regularly missing education, or not taking part in education.

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploited even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## **Modern Slavery**

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking':

- Staff must be aware of the above and contact the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL should then contact the NCA

## **Peer on Peer Abuse**

Occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18

This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

- ALL staff and volunteers understand that children can abuse other children.
- ALL staff and volunteers will inform the DSL of suspected peer abuse/bullying by emailing [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk).
- Peer on peer abuse will be taken as seriously as any other form of abuse.
- All staff understand that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".
- All staff will understand that trainees with SEND are more prone to peer group isolation and MKCF will have extra pastoral support to address this.
- Physical abuse between peers will be managed under MKCF's Behaviour Policy.
- Emotional abuse between peers will be managed under MKCF's Anti-Bullying Policy.
- Harmful sexual behaviour will be identified and managed using the [Brook Traffic Light Tool](#) and MKPDC's CSE toolkit.
- Sexting will be managed on a case by case basis using national and local guidance and advice from [Government Sexting Guidance](#)
- In cases of suspected or actual peer on peer abuse, a risk assessment will be undertaken and appropriate and proportionate control measures put in place to manage and reduce risk. The DSL will seek advice from MK Council MASH.
- Referrals to Children's Social Care, Police and/or other appropriate agencies will be made where thresholds are met.
- DSLs' understand that regarding peer on peer abuse, the victim and the perpetrator are likely to have unmet needs and require support and assessment to determine these.
- The DSL will assess on a case-by-case basis, supported by Children's Social Care and the police if required to ensure the most appropriate response for the children/young people involved.

### **The DSL will consider:**

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

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

- the victim.
- the alleged perpetrator.
- all other children (and if appropriate adult students and staff).
- risk assessments will be recorded and kept under review as a minimum termly.

## **Domestic abuse**

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

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, the child(ren) may blame themselves for the abuse or may have had to leave the family home as a result.

- ALL staff and volunteers understand what domestic abuse is and the potential impact upon children and how this might be displayed.

**The DSLs will: -**

- Ensure that MKCF has suitably trained Key Adult/s (DSLs) in order to fulfil its obligations under Operation Encompass <https://rsb.org.uk/uploads/about-operation-encompass.pdf> .

### **Homelessness**

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

The DSL and Team members will be aware of contact details and referral routes into 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' violence (including FGM and forced marriage)**

So-called 'honour-based' violence (HBV) 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 HBV 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 HBV 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.

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 trainee is at risk of FGM.

Indicators that FGM has already occurred include:

- A trainee confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/trainee 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.
  - Being repeatedly absent from education, or absent for a prolonged period.
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
  - Asking for help, but not being explicit about the problem.
  - Talking about pain or discomfort between her legs.

Potential signs that a trainee 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 a 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 stating that they or a relative will take the girl out of the country for a prolonged period.
  - Requesting help from a staff member 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 education.
  - 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 one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

The DSL will:

- Speak to the trainee 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 [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the trainee to welfare support, as appropriate

### **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. 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.

MKCF has 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 online training to equip them to identify children at risk.

We will assess the risk of children in MKCF 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 trainees to stay safe online at MKCF and at home by discussion during induction and regular reinforcement by enterprise staff during meetings.

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 trainees' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a trainee 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 social media.
- 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 trainee, they will follow our procedures as set out throughout this policy, including discussing their concerns with the DSL.

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

#### **Checking the identity and suitability of visitors;**

All visitors will be required to verify their identity to the satisfaction of staff and be accompanied to the room they will be using.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter past the reception desk. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge or their professional ID.

Visitors to MK Christian Foundation who are visiting for a professional purpose, such as educational psychologists and social workers etc, will be asked to show photo ID and:

- Have a pre-booked appointment.

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

#### **Missing trainees**

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, the attendance team will send duty staff to ensure they are not in the building. When a thorough search has taken place we will alert parents/carers.

## Appendix 1

<b>Slough ( Berkshire)</b>	<b>01753 476 589</b>
<b>Brent (London)</b>	<b>020 8937 4300</b>
<b>Peterborough (Cambridgeshire)</b>	<b>01733 864180</b>
<b>Norfolk</b>	<b>0344 800 8020</b>
<b>Northamptonshire</b>	<b>0300 126 1000</b>
<b>Buckinghamshire</b>	<b>01296 383 962</b>
<b>Luton</b>	<b>01582 547 653</b>
<b>Bedfordshire</b>	<b>0300 300 8585</b>
<b>Worcestershire</b>	<b>01905 822 666</b>
<b>Nottinghamshire</b>	<b>0300 500 80 80</b>
<b>Swindon</b>	<b>01793 445500</b>

## Appendix 2

### **Covid19 (left in place due to ongoing potential changes to working conditions)**

Safeguarding and Child Protection Policy COVID-19 for MKCF is committed to safeguarding and promoting the welfare of children. This commitment remains the same in the difficult circumstances brought about by the COVID-19 outbreak. During this period the principles and practices of the school's Safeguarding and Child Protection Policy (including the Code of Conduct) will continue to apply. In order to ensure the safety and welfare of children whilst working in extraordinary circumstances, the school will adhere to the DfE coronavirus guidance: <http://safeguarding.info/covid19safeguarding> In practice, the following procedures will apply:

#### **Designated Safeguarding Lead**

There will always be a nominated DSL or deputy DSL available, either on site or contactable by phone. Where a DSL or deputy is not on site Laura Geering will take responsibility for safeguarding on site if MKCF is open. Pupils or parents with a safeguarding concern should contact the DSL or can email [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk) . MKCF will continue to work with and support the child(ren)'s social workers and local authorities to help protect vulnerable children. This will include liaising with relevant providers and ensuring that vulnerable children and those on the edge of receiving social care support can attend MKCF where appropriate. MKCF will continue to be a safe place for trainees to attend. We will ensure that appropriate staff are on site to maximise safety, and refer to Government guidance for education and childcare settings on how to implement social distancing and advice from Public Health England on handwashing and other measures to limit the spread of COVID19, including temperature checks for anyone entering MKCF premises. Trainees' attendance will be recorded and MKCF will follow up on any trainee expected to attend who fails to arrive. The school will provide a safe environment for online learning.

#### **Pastoral Support**

We recognise that MKCF can be a protective factor for children and young people, and that the current circumstances could affect the mental health of trainees and their parents/carers. Staff will be in regular contact with trainees and will continue to be vigilant for signs of safeguarding risk or emotional distress. Safeguarding concerns should be reported to the DSL as outlined above. Staff are reminded of the need to report any concern immediately and without delay. Pastoral concerns will be addressed initially by the staff, who may involve the Welfare Support Coordinator depending on the nature of the issue. All safeguarding and welfare concerns will be emailed [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk) to in the usual manner. Trainees or parents with a welfare concern should contact the Welfare Support Coordinator. Where a trainee is already known to MKCF as being in need, or is in receipt of welfare-type support in school, the DSL will ensure that a communication and support plan is in place for the child(ren). This may include email or phone contact if MKCF is required to close. The plan will be reviewed regularly and where concerns arise the DSL will consider any referrals as appropriate. All staff are aware to keep a close eye on those trainees and report any concerns immediately.

#### **Working in partnership**

We continue to work closely with our local safeguarding partners and other local agencies. This includes

out of area partners for trainees that have been removed from their local LA for safeguarding reasons.

### **Appendix 3**

#### **The use of MK Christian Foundation premises by other organisations**

Where services or activities are provided separately by another body using MK Christian Foundation premises, the Foundation House team will seek assurance that the organisation concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection. All hirers will be asked to confirm that they have the appropriate policies in place and will produce them, if requested, before any booking will be confirmed

### **Appendix 4**

#### **Management of Mental Health Problems**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one. Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education. Staff should take action on any mental health concerns that are also safeguarding concerns, following MK Christian Foundation's Safeguarding and Child Protection Policy by speaking to or emailing the DSL or deputy DSL on [safeguarding@mkchristianfoundation.co.uk](mailto:safeguarding@mkchristianfoundation.co.uk).