



Ysgol Bethania

SAFEGUARDING CHILDREN POLICY

Signed by:

Headteacher

Date:

L. Medci

Director/Proprietor

23/07/2026

Date:

A. Higham

Director/Proprietor

23/07/2026

Date:

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Mission Statement

The school is part of Shining Stars School and College LTD. Shining Stars School and College is the operational name for the education services of Shining Stars School and College Limited. Shining Stars School and College is a social-purpose organisation that seeks to transform the lives of children and young people with ALN and Complex Needs. Our approach is grounded in the lived experience of the children and young people we support and in valuing their contributions. As experts by experience, Shining Stars School and College ensure the services they receive are personal to them.

Introduction

This Safeguarding Children Policy is underpinned by the Essential Standards below. Along with the Shining Stars School and College Mission Statement, these Essential Standards set out the organisation's commitment to safeguarding and promoting children's welfare.

Essential Standards

- **Individualised Education** - Children and young people will receive education and support that is tailored to meet their specific needs and any diverse needs.
- **Dignity and respect** – Shining Stars School and College will ensure children and young people have privacy when needed and appropriate, are treated as equals, are given appropriate support to help them to be independent, to fulfil their potential, and to be involved in their respective local communities.
- **Equality** – Shining Stars School and College is an inclusive organisation that works hard to ensure that children and young people are safeguarded and have the same protection regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. Shining Stars School and College is committed to anti-discriminatory practice. In so doing, we recognise the additional needs of children from minority ethnic groups and disabled children, including the barriers they face.
- **Safety** – Shining Stars School and College will ensure that appropriate safeguarding practice is in place so that children and young people do not receive unsafe care or treatment or be put at risk of any potential harm. A robust risk assessment strategy will be in place to minimise harm during activities and the delivery of education and support. Shining Stars School and College will ensure children and staff have the appropriate knowledge, qualifications, experience, competence, and skills to keep children and young people safe through appropriate learning and development opportunities.
- **Safeguarding from abuse** - Children and young people have an absolute entitlement to receive care and support without suffering any form of abuse or improper care. This includes disproportionate restraint, unnecessary or inappropriate restrictions on freedom, bullying, neglect, and abuse from their peers, carers, and all professionals involved in their care.
- **Complaints** – Shining Stars School and College will ensure that the systems in place for handling complaints are followed by staff to make sure that all complaints are monitored and considered seriously, handled, and responded to sensitively. The complaint investigation will be comprehensive and conducted in a timely manner, including informing the complainant about the outcome of their complaint. Any areas for learning will be identified and discussed to enable appropriate action.
- **Whistleblowing** – Shining Stars School and College have a robust whistleblowing policy, and staff have a duty of care to raise and report concerns. That it is known by all staff and is supported by staff training. We encourage the active reporting of any concerns raised by our staff, our children, and young people, and third

parties, and we ensure that all such concerns are addressed in a timely manner. Any learning from such reports will be embedded into continuing professional development and will inform professional practice.

- **Good governance** – Shining Stars School and College have an Independent Safeguarding and Quality Improvement Governance Board to ensure that a robust governance framework is in place, including scrutiny and oversight of internal and external service audits. Good governance will help improve service delivery and identify and minimise risks to children and young people’s health, safety, and wellbeing.
- **Legislative framework** – Shining Stars School and College will ensure that it complies with regulatory standards, regulations, and government guidance that underpins its services relating to schools in Wales.
- **Staffing** – Shining Stars School and College will ensure that its staff comply with these essential standards through appropriate levels of support, culturally appropriate training, and supervision that is reflective, empowering, and insightful to effectively assist them in their role.
- **Fitness to practice** – Shining Stars and College will seek to recruit and retain a staff that can evidence their competence, knowledge, and professional practice to provide safe and appropriate care in line with their roles and responsibilities.

Who to contact with any concerns regarding child protection and safety, and how to contact them.

Ysgol Bethania contacts

Academic year 2026-2027	Designated Safeguarding Person	Deputy Designated Safeguarding Person	Designated Safeguarding Person	Designated Safeguarding Person
	TBC	TBC	Amanda Higham	Liliana Modoi
	Headteacher	Teachers	Education Director/Proprietor	Proprietor

Clarification note: The names and direct contact details for the school’s Designated Safeguarding Lead/Designated Safeguarding Person and Deputy Designated Safeguarding Lead/Deputy Designated Safeguarding Person will be confirmed and inserted once appointments are finalised. Until these appointments are confirmed, safeguarding concerns must be reported without delay to the named senior safeguarding contacts and local authority safeguarding contacts listed in this policy. This policy applies to Ysgol Bethania as a school in Wales and is therefore governed by the Welsh safeguarding framework, including Keeping Learners Safe and the Wales Safeguarding Procedures. References to English guidance are included only as supplementary good practice where relevant and do not replace the statutory Welsh safeguarding requirements applicable to the school.

Flintshire Key Contact Details

To make a Child Protection Referral	Office Hours phone number: 01352701000 Out of Hours phone number: 08450533116
Generic Contact Centre number Children’s Safeguarding General Enquiries	Telephone number: 01352702601

Looked After Children	01352701092
Children's Safeguarding Managers	01352704966/701049
Flintshire and Wrexham Local Safeguarding Children Board (Children's Single Point of Access (SPoA) Kate Brooke	Wrexham Council, 16 Lord Street, Wrexham, LL11 1LG 01978 292039 SPOAchildren@wrexham.gov.uk
Child Protection Referral	Duty Social Worker, Duty and Assessment Team, Social Services for Children: 01352701000 Out of Hours: 03450533116 Enquiries Email : ChildProtectionReferral@flintshire.gov.uk
North Wales Police Prevent Officer	Richard Rees 01978 834 062 Emergency: 999 Non-Emergency : 101
NSPCC whistleblowing advice line	ADDRESS: Weston House, 42 Curtain Road, London, EC2A 3NH TEL: 0800 028 0285 email: help@nspcc.org.uk

ACTIONS TO BE TAKEN AT YSGOL BETHANIA IN CASE OF:

PROFESSIONAL ABUSE

Who?	Whom to inform/ report to?
Staff member	Headteacher (TBC) DSP Tel:
Head Teacher (TBC)	Amanda Higham Tel: 07834604628
Amanda Highma	Liliana Modoi Tel: 07808223690

CHILD SAFEGUARDING CONCERNS

Who?	Whom to inform/ report to?
Staff member	Head Teacher (TBC) DSP
Headteacher (TBC)	Amanda Higham Tel: 07834604628
Amanda Higham	Liliana Modoi Tel: 07808223690

Principles

- All students have an **absolute right** to a childhood free from abuse, neglect, or exploitation.
- All students have an **equal right** to protection from abuse, neglect, or exploitation and a responsibility not to abuse or exploit others.
- **All teachers, teaching support, and carers** have a **responsibility** to be aware of the issues of child abuse/neglect and a **duty** to report and refer any concerns.
- Students are best kept safe when professionals work effectively together and share responsibility for protective action.
- Where there are concerns about a student's safety, unconditional confidentiality cannot be guaranteed and should not be offered. When a student has suffered abuse, neglect, or exploitation in the past, information on this should be shared only on a 'need to know' basis.
- Teachers, teaching support, and carers should be proactive and take positive steps to inform students of their rights to safety and protection and the options available to express their fears or concerns.
- When students make allegations of abuse or neglect, or exploitation, they should always be listened to, have their concerns taken seriously, and where appropriate, thoroughly investigated.
- All teaching, teaching support, and carers charged with the responsibility of safeguarding children have a right to training and appropriate levels of supervision and support.
- All staff ensure that children are growing up in circumstances consistent with the provision of safe and effective care.
- Safeguarding is paramount in all practices at our school. Throughout the curriculum, the safety and safeguarding of our students is addressed. This can be done through focused sessions on IT and community safety, as well as in PSE lessons on drug abuse, keeping safe, online safety, and healthy relationships.

Aims

- To ensure that the students educated at our school are properly protected and that their welfare is promoted.
- To ensure that our policy meets the expectations of Welsh Assembly Government circular 007/2013 'Safeguarding Children in Education: The role of local authorities and governing bodies under the Education Act 2002' and the non-

statutory guidance 009/ 2014 'Safeguarding Children in Education: handling allegations of abuse against teachers and other staff' and is compliant with the All-Wales Child Protection Procedures 2008 as well as '[Keeping Learners Safe 283/2022](#)'. This policy furthermore takes guidance from Working Together to Safeguard Children, [Keeping Children Safe in Education](#), and 'Sexting in schools and colleges 2016'.

- To ensure that our school complies with the policies and procedures of the North Wales Safeguarding Children Board.

Objectives

- To ensure that the safety and welfare of students are paramount at our school.
- To clarify for staff at all levels their responsibilities in relation to child abuse and to ensure that concerns/allegations are effectively managed.
- To reassure teachers, teaching support and carers, those with parental responsibility, and Placing Authorities that our School takes the issue of child protection seriously and will always respond quickly and positively to keep students safe.
- To ensure that all students educated at our school are aware of their unconditional right to be kept safe and free from harm.

Definitions / Types of Abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger, for example, via the internet. They may be abused by an adult/s or another child/children.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, 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

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet another person's needs. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions beyond the child's developmental capabilities, overprotection, limiting exploration and learning, or preventing the child from participating in normal social interactions. It may involve witnessing or hearing about the mistreatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child 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. They may also include 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 or electronic communication). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Criminal Exploitation

“County line exploitation can affect any child or young person (male or female) under the age of 18 years; any vulnerable adult over the age of 18 years; it can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups, males or females, and young people or adults, and is 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.”

Neglect

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 because 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 caregivers); or
- provide access to appropriate medical care or treatment.

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

A student is deemed to have been abused or neglected if they have suffered significant harm due to their experiences.

The Children Act does not define 'significant' but refers to it as 'considerable,' 'noteworthy,' or 'important.' It defines harm as ill-treatment (physical, sexual, emotional abuse, and neglect) or impairment of health (physical or mental) and/or development (physical, emotional, intellectual, social, or behavioural).

Sexual Exploitation (definition developed by the National Working Group for Sexually Exploited Children and Young People (N.W.G.)

Sexual Exploitation of children and students under 18 involves exploitative situations, contexts, and relationships where students (or a third person or persons) receive 'something' (for example, food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing sexual activities and/or another person performing sexual activities on them. Child sexual exploitation can occur through the use of technology without the child's immediate recognition, for example, persuasion to post sexual images on the internet/mobile phone with no immediate payment or gain. In all cases, those exploiting the child/student have power over them by virtue of their age, gender, intellect, physical strength, and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or student's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

All students involved in sexual exploitation are to be regarded as 'children in need', some of whom might have additional child protection needs. (Cross-reference 'Child Sexual Exploitation Policy')

Scope

The procedures outlined in this policy apply to all students (under the age of 18 years) educated at our school and must be followed where there are concerns that a student has suffered or may be at risk of suffering harm, and the person responsible is one of the following:

- A teacher, teaching support, or another adult employed by the school.
- An adult known to the student (relative, family friend, neighbour)
- A professional person who has contact with the student through their employment.
- Another student (sexual abuse/exploitation concerns)
- People involved in organised abuse.

These procedures apply when a student is assaulted by any adult, whether they are known to the student or to the school. We have a duty of care; in certain circumstances, we will need to act on behalf of the child/children. Parents/carers, / Social worker / legal guardian, and the police will be informed in all instances to protect the welfare of the student/young person. All instances should be discussed with the Headteacher, who will decide, in consultation with the Education Director/Proprietor, on the next steps to safeguard the child and on how to involve all other stakeholders.

Training

We will ensure that all adults in the school community attend regular awareness training on a wide range of safeguarding topics and that both Designated Safeguarding Persons undertake two-yearly training in their role.

Training organised by the Shining Stars School and College Training Department will take place for school staff.

- on induction to Shining Stars School and College, and the school
- throughout the academic year

All school staff:

- Have equal chances of training, career development, and promotion.
- Receive training on induction, which specifically covers:
 - All aspects of this policy
 - School Staff Code of Conduct
 - Keeping Learners Safe/ Keeping Children Safe
 - Working Together to Safeguard Children
 - Female Genital Mutilation
 - Prevent Awareness
 - Safeguarding pupils who are vulnerable to extremism.
 - Child Sexual Exploitation
 - Radicalisation and Extremism
 - Listening to Pupils
 - The Safe Use of the Internet and social media
 - Equal opportunities
 - Inclusion
 - County Lines
 - Safe Handling Medication in Education

All staff are also required to:

- Read Keeping Learners Safe (Summary Guidance) and confirm that they have done so. *Each time Keeping Learners Safe is updated by the Welsh Assembly Government, staff will be updated on the changes via email and/or in-person training.*
- Complete Modules 1-4 Keeping Learners Safe from the Hwb website:
 - [Keeping Learners Safe: Module 1 on Hwb](#) **Introduction to safeguarding - Keeping learners' safe module 1** *Everyone in education should share a common goal of keeping learners safe. This module will help you understand safeguarding and your responsibilities. It is the first module of three available in this package and appropriate for all staff.*
 - [Keeping Learners Safe: Module 2 on Hwb](#) **Safeguarding roles and responsibilities - Keeping learner's safe module 2** *In this module, you will learn more about your role and responsibilities when it comes to keeping learners safe.*
 - [Keeping Learners Safe: Module 3 on Hwb](#) **Safeguarding practice case studies - Keeping learners' safe module 3** *In this module, we will look at some case studies. These will help you to put what you now know about keeping learners safe into practice.*

- [Keeping Learners Safe: Module 4 on Hwb](#) **Online safety for practitioners - Keeping learners' safe module 4** In this module, you will learn what online safety means, and about the important role you have when it comes to keeping learners safe online.

All school staff must undertake appropriate annual renewal training in:

- Child protection issues
- PI training
- Recognising signs of abuse
- Handling disclosures

All school staff must attend additional awareness training in the following:

- What to do if a child is being abused
- Peer-on-Peer abuse
- Honour-based violence
- Understanding and knowing how to overcome the additional safeguarding vulnerabilities of learners with ALN.

Safer Recruitment

- To ensure a safer recruitment process is in place.
- To prevent people who pose a risk of harm from working with children.
- To check the staff who work with children.
- To take proportionate decisions on whether to ask for any checks beyond what is required.
- To ensure that at least one person on any appointment panel has undertaken safer recruitment training.

Disclosure and Barring Service Checks

- To ensure Disclosure and Barring Service checks are undertaken for everyone working with children in the school.
- To complete prohibition checks for everyone in teaching work and to check that no one is restricted from working as a teacher in another EEA country.
- To ensure all visitors are suitably checked and monitored.
- To ensure Disclosure and Barring Service checks are undertaken for those who volunteer to run an after-school sports club, such as football, netball, rugby, etc.
- To ensure Disclosure and Barring Service checks are undertaken for any adult employed by the school from a sports agency who coaches children either in school or as an after-school club.

Single Central Record

- To ensure a Single Central Record is in place, up to date, and fulfils all statutory requirements that cover everyone who works in regular contact with children, such as:
 - school staff
 - speech and language therapist
 - other staff working in the school.
 - Proprietors/Directors

The following information will be recorded for all school staff:

- an identity check.
- a barred list check.
- an enhanced DBS. check/certificate.
- a prohibition from teaching check
- a check of professional qualifications
- a check to establish the person's right to work in the U.K.
- a section 128 check for those in school management positions
- checks on those who have lived or worked outside the U.K.

Prevention

It is not appropriate to place sole responsibility for students' safety on them. However, with the help and support they receive at our school, it is possible to make abuse and exploitation less likely through a proactive prevention programme.

Teachers/teaching support at our school will ensure that all students are aware of their absolute unconditional right to be kept safe and free from harm. Teachers/teaching support will work with individual students on personal safety and protection, providing advice, guidance, and assistance on how to keep themselves safe in the future.

Teaching Staff and others will also act as 'Safe Adults' to whom students can turn for help if they have been harmed or fear they may be harmed in the future. They will also inform students of other safeguarding options, including the name and phone number of the Designated Safeguarding Person for Ysgol Bethania, the local Children's Rights Office, Child Line, and the local police. Contact details will be displayed in classrooms.

It is important for Headteachers/teaching support to also emphasise with each student their responsibilities not to harm or exploit any of the other students with whom they study and to treat them with dignity and respect (cross-reference 'Anti-Bullying Policy')

To minimise the risk of abuse, teachers/teaching assistants' support must:

- Make full assessments of children's histories and any experience of abuse
- Observe contacts between children, look out for concerns, and share observations with other staff (staff meetings, seniors meetings, line manager supervisions)

- Supervise children at all times, where possible
- Observe and minimise physical contact between staff and children ('Safe Caring')
- Risk assess one-to-one time alone by staff with children
- Recognise the possible involvement of children in exploitation and look out for the signs
- All staff will be vigilant at all times about students accessing social media and the Internet. During school hours, all use of IT equipment will be fully monitored and risk-assessed, and young people will have no access to social media. Staff will be vigilant against any form of cyberbullying, grooming, inappropriate relationship building, mental health, gambling, online sexual violence and harassment, self-worth, child development, criminal exploitation, device addiction, child sexual exploitation, radicalisation, and reputation damaging.
- include in the curriculum, activities and opportunities for relationships and sexuality education which equip children with the skills they need to stay safe from abuse and to know to whom to turn for help.
- include in the curriculum material that will help children develop realistic attitudes to the responsibilities of adult life, particularly regarding childcare and parenting skills.
- build relationships with other agencies and ensure early and appropriate referrals for support and intervention are made before risks escalate.

Presentation

Safeguarding concerns about students who are educated at our school can arise from one of three sources:

- From their contact with people, they know in the community (family, friends, relatives, organised perpetrators – see 'Child Sexual Exploitation policy')
- From their contact with professionals who are involved in their care and education (Residential and Field Social Workers, Teachers, Psychologists, Foster Carers, etc)
- From their contact with other students with whom they live

Concerns can arise either through a direct allegation by the student himself or through an allegation/disclosure or observation by a third party (another student / a teacher/teaching support/ carer / other professionals / non-professional people).

Teachers, teaching support, and carers will always be available to listen to students who want to express concerns about their own or other students' safety. Whoever the students choose to tell of their concerns has a **personal** responsibility to take the appropriate action to promote the student's safety (See Appendix III).

If ever a student chooses to disclose their own abuse or express concerns about another student's safety, **inaction is not an option.**

All allegations or concerns in relation to abuse, neglect, and/or sexual Exploitation will be taken seriously and managed in line with North Wales Safeguarding Children Board Procedures (See Appendix I).

Each member of staff is required to familiarise him/herself with the contents of the North Wales Safeguarding Children Board guidance.

All teachers/teaching support receive training in Safeguarding Children at Induction and on an ongoing basis to ensure that they remain competent and are equipped to meet the safeguarding needs of the students they look after. All teachers/teaching support receive regular supervision during which issues related to the management of child safeguarding concerns can be addressed and any training needs identified.

Appendices II and III should be shared with all teachers/teaching support, and case scenarios should be provided to assess their understanding of how to manage concerns.

Dealing with Disclosure

The following procedures should be followed when a young person discloses to a member of staff.

Staff must not make absolute guarantees of confidentiality to those who report possible significant harm to them, but they should guarantee that the information will be shared only with the minimum number of people who need to know to ensure proper action is taken to address the issue. Below is a list of Do's and Don'ts to help staff understand their role in dealing with Safeguarding Concerns.

DO

- Listen to the young person attentively and maintain eye contact.
- Allow the young person to talk, but don't press for information.
- Tell the young person that they are not to blame for anything that has happened.
- Reassure the young person that they were right to tell.
- Let the young person know that other people will have to be told so that the abuse can stop.
- Try to explain in a way that the young person can understand.
- Report the disclosure to the DSP, following correct policy and procedure.

DON'T

- Promise to keep secrets or make any promises that you can't keep.
- Interrogate the young person or ask leading questions.

- Cast doubt on what they have said or made the young person feel responsible for what's happened.
- Show anger or panic and act hastily.
- Talk to the alleged abuser or attempt to conduct their own investigation.

Recording

If students choose to disclose their abuse, neglect, or exploitation to teachers/teaching support, this should be managed in line with the guidance above (Dealing with disclosure) and fully recorded on Cpoms.

The record must include details of the date, time, location, and circumstances in which the disclosure was made, in addition to as near as possible a verbatim account of what the student said. Teachers/teaching support will not 'translate' the student's account into adult language, censor it, or impose their own interpretation on what has been alleged. In addition, it should be legible, clear, concise, and free from jargon and abbreviations, separate fact from opinion, and signed.

The record should be made as soon as practicable after the information is received, and at the latest by the end of the school day on which the situation arose.

The member of staff to whom the disclosure was made should inform the designated safeguarding person or, in their absence, the deputy designated safeguarding person as soon as possible. The designated safeguarding person will make a same-day referral to Children's Services, if required, in line with Welsh Safeguarding policies.

Dealing with concerns about Professional Abuse

If staff become concerned about possible abuse/exploitation through their observations of students in contact with other adults (professional or otherwise), they should record the date, time, location, and circumstances in which the concerns arose, and the aspects of the interaction that caused concern. Again, this record should be made as soon as possible after the incident causing concern, and no later than the end of the school day. The information should be passed immediately to the Headteacher.

The Headteacher should contact the senior Safeguarding Manager for Wrexham for advice and, if appropriate, make a referral. The senior Safeguarding Team can be contacted on:

01978292 039 or 0345053 3116 (out of hours)

Where the concern/allegation is against the Headteacher, the member of staff should report this to the Education Director, Amanda Higham, 07834604628, amanda.higham@ysgolbethania.co.uk

Record keeping in respect of allegations against staff/carers.

The organisation will keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and details of any action taken and decisions reached on a person's confidential personnel file, and give a copy to the individual. Such information will be retained on file, including for people who leave the organisation, at least until the person reaches normal retirement age, or for 10 years if that is longer. The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will clarify cases where a future DBS reveals that the police received an allegation, but it did not result in a prosecution or conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period.

All allegations or concerns about abusive or potentially abusive behaviour of professionals will be taken seriously and investigated thoroughly. If the allegation relates to staff working for our school, the 'staff allegation management form' must be completed by the Headteacher and forwarded to the Education Director for further processing and management.

If a teacher/teaching support receives an allegation from a student or a third party, or observes behaviour that causes them concern, they should follow the procedure set out in Appendix II.

Upon receipt of this information, the Headteacher will decide how to progress the concerns (in line with the Whistleblowing Policy). If the Headteacher is unsure whether the alleged behaviour constitutes abusive behaviour, they must consult the Senior Manager, Safeguarding, and keep a record of this consultation.

If it is agreed that the matter will be progressed as a Safeguarding concern, it will be managed in line with North Wales Safeguarding Children's Board procedures. In this circumstance, the designated member of staff will inform the Placing Authority, the Senior Manager Safeguarding verbally, and confirm the information in writing by the end of the next working day.

N.B. When using these procedures, if the person to whom concerns should be reported is unavailable, the information should be passed directly to the designated member of staff. Under no circumstances should there be any avoidable delay in progressing concerns about students' safety and protection.

The paramount consideration in managing allegations or concerns about professional abuse is the safety and welfare of students. This consideration must, however, be tempered by the need to treat teachers/teaching support fairly and to respect the principles of natural justice.

Given the students' vulnerability at our school, we must take a "safety first" approach to any expressions of concern about professional misconduct. Therefore, this policy acknowledged the need to act on allegations and that any short-term action taken by the school to safeguard and promote the welfare of children is without prejudice (i.e., no presumption of guilt). No disciplinary or other action will be taken without a full and proper investigation, during which the accused member of staff will be given the opportunity to respond to any allegation made.

In managing allegations of professional abuse, this policy distinguishes between those relating to sexual abuse and those relating to physical abuse.

Allegations of Sexual Abuse – Red Allegations

In the event of a red allegation, the teacher/teaching support or carer who receives the allegation informs the alleged perpetrator that a red allegation has been made. This person then leaves the school without trying to obtain any further information about the content of the allegation from either colleague(s) or student. If the alleged perpetrator attempts to obtain further information, this constitutes misconduct and will attract a disciplinary response, irrespective of the investigation outcome. Similarly, a refusal to leave the school would constitute misconduct, and a disciplinary response would follow.

At this stage, the Designated Safeguarding Person must be consulted to decide the way forward.

The alleged perpetrator will be contacted by the Headteacher (who is also the Designated Safeguarding Person) within 24 hours to be informed of how the matter will be progressed.

Allegations of Physical Abuse – Blue Allegations

In the event of a blue allegation, the teacher/teaching support or carer who receives the allegation informs the alleged perpetrator that a 'Blue Allegation' has been received. This person then removes themselves from the "shopfloor" and has no further contact with the student making the allegation (or any other colleague), or leaves the school, pending a decision by the Headteacher on how the matter should be progressed. This decision will be made as soon as possible, **but no later than one hour** from the information being brought to his/her attention by the person receiving the allegation.

A failure by the alleged perpetrator to comply with this policy constitutes misconduct and will result in disciplinary action.

Additional Considerations

Parents/carers of a child or children involved should be informed of the allegation as soon as possible, if they do not already know (the placing authority social worker can decide who will do this). They should be kept informed of a case's progress and notified of outcomes when there is no criminal prosecution. That includes the outcome of any disciplinary process.

Shining Stars School and College's HR department will nominate an officer to keep the individual subject to the allegation informed of the progress of the case and to arrange appropriate support while the case is ongoing. If the person is suspended, the employer should also arrange to keep the individual informed of workplace developments.

Where the concern or allegation has come from a member of staff, the whistleblowing procedures apply to the concern being raised (see 'Whistle Blowing Policy').

Concerns may arise that a person who works with children has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence.

- enquiries and assessment by children's social care about whether a child is in need of protection or need of services; and
- consideration by an employer of disciplinary action in respect of the individual.

Some cases will also need to be referred to the DBS for consideration of including the person on the DBS barred lists, or to professional bodies or regulators.

Written guidance for staff makes clear that teachers/teaching support, who are the subject of an allegation, will have access to information and support whilst an investigation continues. (Please refer to the Disciplinary policy for full details. In brief, the following actions will be undertaken:

Suspension

Teachers/teaching support staff who are the subject of an allegation will be suspended in consultation with the Senior Manager Safeguarding.

A suspension in itself should not be taken as a disciplinary sanction but as a precautionary measure to protect all concerned, particularly when allowing the employee to continue working during an investigation may compromise the integrity of the investigative process.

During suspension, employees are prohibited from attending the workplace other than for the purpose of attending meetings/hearings concerning the matter and should not make contact with any work colleagues or students in the Company's care, with the exception of their nominated representative, in most circumstances this will be a member of the HR Department. Whilst each case will be handled on its merits, any necessary suspension will be kept to the minimum necessary and kept under review.

Where the matter under investigation relates to child protection or safeguarding, it may not be possible to disclose the specific allegations made during initial suspension to avoid jeopardizing the investigation or leading to further allegations. Full details of the allegations under consideration will be presented at the investigation meeting, and the individual will be given an opportunity to consider the matters being raised.

Re-deployment pending an investigation.

In some cases of physical abuse allegations (such as where there are no visible injuries to children, but the allegation has been made with no 3rd party witnesses), following consultation with the Senior Manager Safeguarding (SMS), a staff member may be re-deployed into another school/department and undertake supervised duties not entailing one to one time with children. Each case will be considered individually, with a clear record maintained by the School's Designated Safeguarding Person of how the decision was reached and who was involved. The Senior Manager Safeguarding will be made aware of all allegations that may arise against a person who works with children:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates she/he is unsuitable to work with children.

If there is suspicion that a child is suffering, or is likely to suffer, significant harm, the designated safeguarding person should convene a strategy discussion. N.B. In these cases, the strategy discussion should include a representative of the

organisation (unless there are good reasons not to) and take into account any information we can provide about the circumstances or context of the allegation.

In cases where a formal strategy discussion is not considered appropriate because the threshold of 'significant harm' is not reached, but a police investigation might be needed, the SMS should nevertheless conduct a similar discussion with the police, the employer, and any other agencies involved with the child to evaluate the allegation and decide how it should be dealt with.

The organisation will inform the accused person about the allegation as soon as possible after consulting the SMS. However, where a strategy discussion is needed, or it is clear that police or children's social care may need to be involved, this will not proceed until those agencies have been consulted and agreed on the information that can be disclosed to the person. If the person is a member of a union or professional association, she/he should be advised to seek support from that organisation.

Decision making

If the complaint or allegation is clear that investigations by police and/or enquiries by children's social care are not necessary, or the strategy discussion or initial evaluation determines that is the case, the Senior Management Safeguarding (SMS) should discuss next steps with the organisation. In those circumstances, the options available to us, as the organisation, range from taking no further action to summary dismissal or a decision not to use the person's services in the future. The nature and circumstances of the allegation, along with the available evidence and information, will determine which range of options is most appropriate.

In some cases, further investigation will be needed to enable a decision about how to proceed. If so, the Senior Manager Safeguarding should discuss with us, the organisation, how and by whom the investigation will be undertaken. This should normally be undertaken by us as the employer. However, in some circumstances, if appropriate resources are not available in the organisation, or the nature and complexity of the allegation point to us commissioning an independent investigation.

Resignations and 'compromise agreements.'

The fact that a person tenders their resignation or ceases to provide their services must not prevent an allegation from being followed up in accordance with these procedures. It is important that every effort be made to reach a conclusion in all cases of allegations concerning the safety or welfare of children, including any in which the person concerned refuses to co-operate with the process. Wherever possible, the person should be given a full opportunity to answer the allegation and make representations about it, but the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be regarded as substantiated on the basis of all the information available should continue even if that cannot be done or the person does not co-operate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's notice period expires before the process is complete, but it is important to reach and document a conclusion wherever possible.

By the same token so-called 'compromise agreements' by which a person agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference must not be used

in these cases. In any event, such an agreement will not prevent a thorough police investigation where appropriate. Nor can it override an employer's statutory duty to make a referral to the DBS where circumstances require that.

The following definitions should be used when determining the outcome of allegation investigations:

- a) **Substantiated:** There is sufficient evidence to prove the allegation.
- b) **False:** There is sufficient evidence to disprove the allegation.
- c) **Malicious:** There is clear evidence to prove that there has been a deliberate act to deceive, and the allegation is entirely false.
- d) **Unfounded:** There is no evidence or proper basis that supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Dealing with allegations/observations of abuse, neglect, or exploitation that arise in the community.

If information is received either directly or via a third party that a student has been abused by a person known to them in the Community, this will be taken seriously and dealt with in line with Appendix III.

If the Headteacher has any doubt about whether the information received constitutes a child safeguarding concern, he/she **must** consult with a more senior designated member of staff. If, following this consultation, it remains unclear whether the situation requires a safeguarding response, the designated member of staff must consult the Senior Manager Safeguarding for Flintshire and Wrexham to agree a way forward. The designated member of staff will keep a record of this consultation.

If the allegation relates to sexual exploitation, the above procedure applies, except that the Headteacher will consult with the Senior Manager, Safeguarding, to agree an appropriate level of response (either via the Safeguarding Children Procedures or through the student's ongoing placement plan/PEP).

Dealing with allegations of Peer Abuse / Exploitation

In the event of information being received either directly or via a third party that one student is being physically or emotionally abused by another student, this will be taken seriously and dealt with through the school's Anti-Bullying Policy.

If allegations relate to sexual abuse or Exploitation, these should be managed in the same manner as the procedures for concerns that arise in the Community. (Cross-reference – CSE Policy)

In these circumstances, it is important to recognise that both the victim and alleged perpetrator are children and that both sets of respective needs must be taken into account in the course of any subsequent investigation/police enquiry.

If it emerges that a student is being physically or emotionally harmed by a sibling, this information must be brought to the attention of the student's parents or social worker, and agreement reached on how the concern should be progressed (either via Safeguarding Children Procedures or the ongoing PEP).

In this event, the person who raises the matter should record the date and time of the discussion and the conclusions reached:

- racist, sexist, homophobic, disablist language or behaviour
- If the Headteacher is uncertain whether the information received amounts to an allegation of sexual abuse/exploitation, then he / she must consult with the Education Director and agree on a way forward. If, following this consultation, it remains unclear whether a Safeguarding response is required, the designated member of staff must consult the Senior Manager, Safeguarding. The designated member of staff must keep a record of the consultation outcome.

Confidentiality

If teachers/teaching support receive information from any source that a student has experienced abuse or exploitation or may be at risk of such, then they have a **duty** to pass this information to the designated member of staff with responsibility for child protection, who in turn will pass the information to the Senior Manager Safeguarding. If the concern relates to the designated safeguarding person, it must be reported to the Education Director, who will contact the Senior Manager, Safeguarding.

If students or non-professional adults wish to share such information with teachers/teaching support, they should be advised that confidentiality cannot be guaranteed. Teachers/teaching support can reassure informants; however, if the allegation is from a third party, the source of the information can remain anonymous. The reason for the decision to share (or not share) information must be recorded in writing and maintained by the designated member of staff.

When there are historical or current safeguarding concerns about a student, this information will be shared on a 'need to know' basis with the minimum number of people necessary to ensure the student's safety and welfare. People who are informed will receive only the minimum information necessary to implement the student's childcare plan or PEP.

All our teachers/teaching support staff will take steps to ensure the confidentiality of information by refraining from discussing the student's history inappropriately and by keeping records in a safe, secure place with access strictly limited.

Partnership

Our School believes that the best outcomes for students are achieved when professionals can work effectively together and with parents/carers. Our school staff believe in open and honest communication and will always share any concerns they have about their children with parents/carers at the earliest opportunity. The only exception to this would be where it was felt such communication might compromise the student's safety.

Ysgol Bethania will be responsible for reviewing these procedures annually, or sooner if there has been a legislative change.

Ysgol Bethania recognises that local safeguarding arrangements may vary. As such, the Education Director/Proprietor is responsible for submitting this policy for consideration and comment to the Safeguarding Children's Board (MWWSCB) and to the Senior Manager Safeguarding (or other senior officers responsible for child protection matters in that department), and are consistent with the local policies and procedures agreed by the NWSCB. Any conflicts between locally agreed procedures and those of other responsible authorities are discussed and resolved where possible.

Children and young people educated at Ysgol Bethania will be made aware of the safeguarding procedures in an age-appropriate manner and format through the Safeguarding Policy for children.

SAFEGUARDING PUPILS/STUDENTS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION, OR TRAFFICKING

Our safeguarding policy, through the school's values, ethos, and behaviour policies, provides the foundation to ensure children and young people are supported to respect themselves and others, to stand up for themselves and protect one another, and to feel safe and secure.

Our school stays up to date on the latest advice and guidance to address specific vulnerabilities and forms of Exploitation.

Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age-appropriate way in their curriculum,

Our school works with and engages our families and communities to talk about such issues,

Our staff are supported to talk to families about sensitive concerns related to their children and to find ways to address them together, wherever possible.

Our Designated Safeguarding Person knows where to seek and get advice, as necessary.

Our School brings in experts and uses specialist materials to support our work.

Female Genital Mutilation (FGM)

FGM involves cutting, and sometimes sewing, the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation. The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen, and Iraq.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland, and Wales on a girl who is a U.K. national or permanent resident, but also to take a girl out of the U.K. to have FGM performed abroad, even to countries where FGM is still legal.

The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss, or is unable to sit comfortably. She may make excuses to avoid P.E. and other physical activity or refuse to use the school showers. She may also become evasive or fearful if you ask whether she is unwell, and she assures you she is fine when she clearly is not. If she is a B.M.E. child and has recently arrived back from a 'holiday' abroad or a period of absence from School, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM, alongside other possible explanations.

Staff will complete the online training on the subject via the SSS Learning Platform and refresh their knowledge through the Hwb site.

Forced marriage.

The subject of forced marriage is also highlighted in Safeguarding Children and Safer Recruitment in Education. Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats, and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents. Once again, schools can be seen as being on the front line in protecting young people from this type of abuse. A pupil who fears they may be forced into marriage may disclose this to a member of staff. Their initial approach, in common with many disclosures of abuse, maybe seemingly innocuous, such as talking about taking a holiday abroad. Their fear that the proposed holiday will result in a forced marriage may only become apparent after several conversations.

These young women may also become victims of what is termed honour-based violence. This type of violence is described in 'The Right to Choose' guidance: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment, and murder, where the person is being punished by their family or their community.'

Prevent Programme

All staff will complete the online Prevent training via the SSS Learning Platform (<https://www.foundationonline.org.uk/course/index.php?categoryid=14>) and may attend annual Prevent training delivered by the local police team(s).

WHAT WE DO WHEN WE ARE CONCERNED

Where risk factors are present, but there is no evidence of a particular risk, then our DSP. advises us on preventive measures that can be implemented within the school to engage the pupil in mainstream activities and social groups. The DSP may be the person who communicates with the pupil/student's family/carers/social workers/legal guardians, sharing the school's concern about the young person's vulnerability and how the family and School can work together to reduce the risk.

The school will review the situation after taking appropriate action to address the concerns.

Incidents will be logged in the Incident Log and Cpoms.

Sharing nudes and semi-nudes

Our school takes guidance from the Welsh Government's statutory guidance: Keeping Learners Safe

All incidents involving youth produced sexual imagery should be responded to in line with the school's safeguarding and child protection policy.

When an incident involving youth that produced sexual imagery comes to the school's attention:

- The incident should be referred to the DSP as soon as possible.
- The DSP. should hold an initial review meeting with appropriate school staff.
- There should be subsequent interviews with the young people involved (if appropriate)

Parents/carers / social workers / legal guardians should be informed at an early stage and involved in the process unless there is a good reason to believe that involving parents would put the young person at risk of harm. At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

Upskirting (see Mobile Phone Safety and Acceptable Use policy), which is now a new criminal offence following the introduction of the Voyeurism (Offences) Act 2019, typically involves taking a picture under a person's clothing without them giving their consent, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (We must be aware that a very young pupil or one with ALN may be aware that she has been the victim of this act but might be intimidated or unaware of her right to complain).

Disclosure

Disclosures about youth-produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSP in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone at school or college, or contact the police directly.

All members of staff (including non-teaching) should be made aware of how to recognise and refer any disclosures of incidents involving youth-produced sexual imagery. This should be covered within staff training and within the school or college's child protection policy. Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should 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.
- 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.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved that would influence risk assessment.
- If there is a need to contact another school, college, setting, or individual.
- Whether to contact parents or carers of the pupils involved - in most cases, parents/carers should be involved.

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

1. The incident involves an adult.
2. 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 additional learning needs)

3. What you know about the imagery suggests the content depicts sexual acts that are unusual for the young person's developmental stage or are violent
4. The imagery involves sexual acts.
5. You have reason to believe a pupil or pupil 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 applies, then a school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSP is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework, and if appropriate local network of support.

The decision should be made by the DSP, with input from the Headteacher and other staff members, as appropriate. The decision should be recorded in line with school policy.

The decision should align with the school's child protection procedures and be based on the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of young people. The decision should be reviewed throughout the incident response process.

If a young person has shared imagery consensually, such as in a romantic relationship or as a joke, and there is no intent to cause harm, it is usually appropriate for the school to handle the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or children's social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

ALN

All staff will be extra vigilant where students with ALN are concerned, as they might not be able to clearly demonstrate or communicate that they would be a victim of abuse, bullying, exploitation, or other safeguarding issues.

ROLES and RESPONSIBILITIES

Designated Safeguarding Person (DSP) and Deputy Designated Safeguarding Person (DDSP)

There are four DSP/DDSP's, their names and contact details can be found on page 5.

The DSP's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSP's responsibility is as follows:

- make sure they know how to recognise and identify the signs of abuse, neglect, and other types of harm, irrespective of whether it is online or offline, and know when it is appropriate to make a report to the local authority (or police where the child/children are in immediate danger).
- provide support to staff members to carry out their safeguarding duties.

- maintain an overview of safeguarding within the school.
- be the first point of contact for parents/carers, students, teaching and non-teaching staff, and external agencies in all matters of child protection (except where an allegation of abuse involves a member of staff)
- works with the Education Director to review and update the school's safeguarding and child protection policy.
- co-ordinate the child protection and safeguarding procedures in the school and will ensure sufficient account of the nature and age range of the school and its students.
- manage referrals of all cases of suspected abuse to the Local Authority Children's Social Services and other external agencies, such as the Disclosure and Barring Service and Police, as appropriate
- maintain an ongoing training program for all school employees from induction and throughout their employment.
- help promote educational outcomes by sharing the appropriate information about welfare, safeguarding, and child protection issues with teachers and the school leadership team.
- monitor the keeping, confidentiality, and storage of records in relation to child protection.
- liaise closely with the Local Authority Education Safeguarding Officer and other external agencies as appropriate.
- MUST liaise with the Education Director/Proprietor to inform them of issues such as ongoing police or safeguarding investigations (unless the allegation involves them)
- discuss any potential safeguarding issues in line with Local Authority Children's Social Services procedures.
- ensure that parents/carers see copies of the child safeguarding policy.
- keep parents informed of actions to be taken under these procedures in relation to their child.
- monitor records of students in the school who are subject to a child protection plan to ensure that this is maintained and updated as notification is received.
- liaise with other professionals to ensure that children who are subject to child protection plans and/or social workers are monitored.
- where appropriate, to take part in child protection conferences or reviews/core groups.
- inform the Local Authority Children's Social Services in writing when a child who is subject to a child protection plan moves to another school, and to inform the new school of the child protection plan as advised by the Children's Social Care department.
- monitor the effectiveness of the school's safeguarding policies and procedures, and ensure the education setting's safeguarding policy is updated and reviewed annually, and work with the senior leadership team regarding this.
- be involved in monitoring the effectiveness of other school policies as required, to ensure there is consistency and coherence in the way the school effectively safeguards its children, as part of tracking 'the golden thread' of safeguarding throughout the school
- consider how safeguarding more widely can be addressed and ensure preventative measures are adopted in the education setting.
- ensure, together with the senior leadership team, that all staff receive appropriate training to help them understand the risk of Radicalisation and what to do if they have any concerns that a child may be at risk of being drawn into terrorism, radicalization, and/or extremism.
- keep and maintain records and attendance of staff training on child protection, PREVENT, and safer recruitment procedures; and
- ensure that, where a child leaves the school, the child protection file is copied for any new school or college as

soon as possible, but transferred separately from the main student file. The DSP will ensure secure transit and obtain confirmation of receipt.

- complete the Keeping Learners Safe: Safeguarding Audit Tool, Annex 3, annually Keeping learners safe | GOV.WALES
- The DDSPs have equal status and access to the same training as the DSP.
- If the Senior Designated Safeguarding Person is unavailable, all their duties will be carried out by one of the Designated Deputies. During term time, the DSP or one of the DDSPs will always be available for staff in the school to discuss any safeguarding concerns. For out-of-hours/out-of-term activities, another designated member of SLT will be the first port of call.
- Ultimate lead responsibility for safeguarding and child protection remains with the DSP, and this responsibility should not be delegated. Full details of the DSP's role can be found in Keeping Learners Safe (283/2022) paragraph 2.15.
- The DSP will attend strategy meetings if the meeting is in regard to a student or a teacher below the level of the DSP.
- If the meeting concerns the DSP or the Senior Leadership Team, then it will be the Education Director who attends; if it concerns the Education Director, then the Proprietor will attend.

Headteacher (who is also a DSP)

- The Headteacher has the responsibility to foster a nurturing culture within the school and promote open communication between staff and students on safeguarding matters.
- They will ensure all staff (including supply teachers and volunteers) fully implement and follow the safeguarding policies and procedures adopted by the Council of Management
- Have both time and access to sufficient resources to enable them to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, as well as contributing to the assessment of children.
- Understand the procedures for safeguarding children, feel able to raise concerns about poor or unsafe practice, and be confident that such concerns will be addressed sensitively and effectively in a timely manner in accordance with the Welsh Government's Procedures for Whistleblowing in Schools (see Whistleblowing in schools: guidance for governors | GOV.WALES)

Appendix I

Recognition and Signs of Abuse

Within the North Wales Safeguarding Children Board Procedures file, there is a list of warning signs of abuse and neglect. All teachers, teaching support, and carers should make themselves aware of these. They should, however, bear in mind that such lists are not exhaustive, and all staff are responsible for seeking further reading and training opportunities to develop their knowledge and skills in recognising and addressing child abuse. Training needs should be brought to the supervisor for appropriate action and review.

Below is a list of some of the signs of physical abuse, sexual abuse, and the impact of emotional abuse:

Physical Abuse

- Multiple bruising to various parts of the body
- Outline bruises- hand marks/ slipper prints, straps.
- Bi-lateral black eyes
- Symmetrical bruising

Sexual Abuse

- Sexually transmitted diseases
- Severe and persistent self-harming
- Genital injuries- alleged accidents with bikes, spikes, fences, self-inflicted- with attendant damage- bruising, tears, etc
- Pregnancy where the identity of the father is vague or secret.
- Itching/ soreness and bleeding to genital/ anal areas

Impact of Emotional Abuse

- Low self-esteem/self-worth
- Behavioural difficulties (overly passive, overly aggressive, promiscuous attachment, etc.)
- Poor educational attainment
- Depression and anxiety

- Disassociation and detachment

Appendix 2

Allegations of professional abuse process

This process is to be followed for all allegations against any professionals including carers within schools and residential services:

- Allegation received
- Reported to senior managers immediately
- Recorded in writing on pro forma

Written report from Headteacher to DSP

The leader informs the DSP, who considers the allegation, consults with the Education Director, and then **SPoA**.

If the concern is in relation to the DSP, report to the Education Director; if about the ED/RHT, then contact the Proprietor; if Proprietor, report to the Board of Governors (follow whistleblowing policy)

Considerations:

The employee has behaved in a way that has:

- Harmed/may have harmed a child
- Committed a criminal offence related to a child
- Indicates he/she may pose a risk of harm to children

Discussion / Outcome:

Criteria met

- **SPoA** record made

Fact Find

Onsite visit from a member of SLT to fact find, with a witness.

Fact Find to SPoA

Call/report fact finding and make decisions for next steps together.

Discussion / Outcome:

Criteria not met

- No further Action
- record made.

Shining Stars School and College LTD

Investigation with HR involvement.

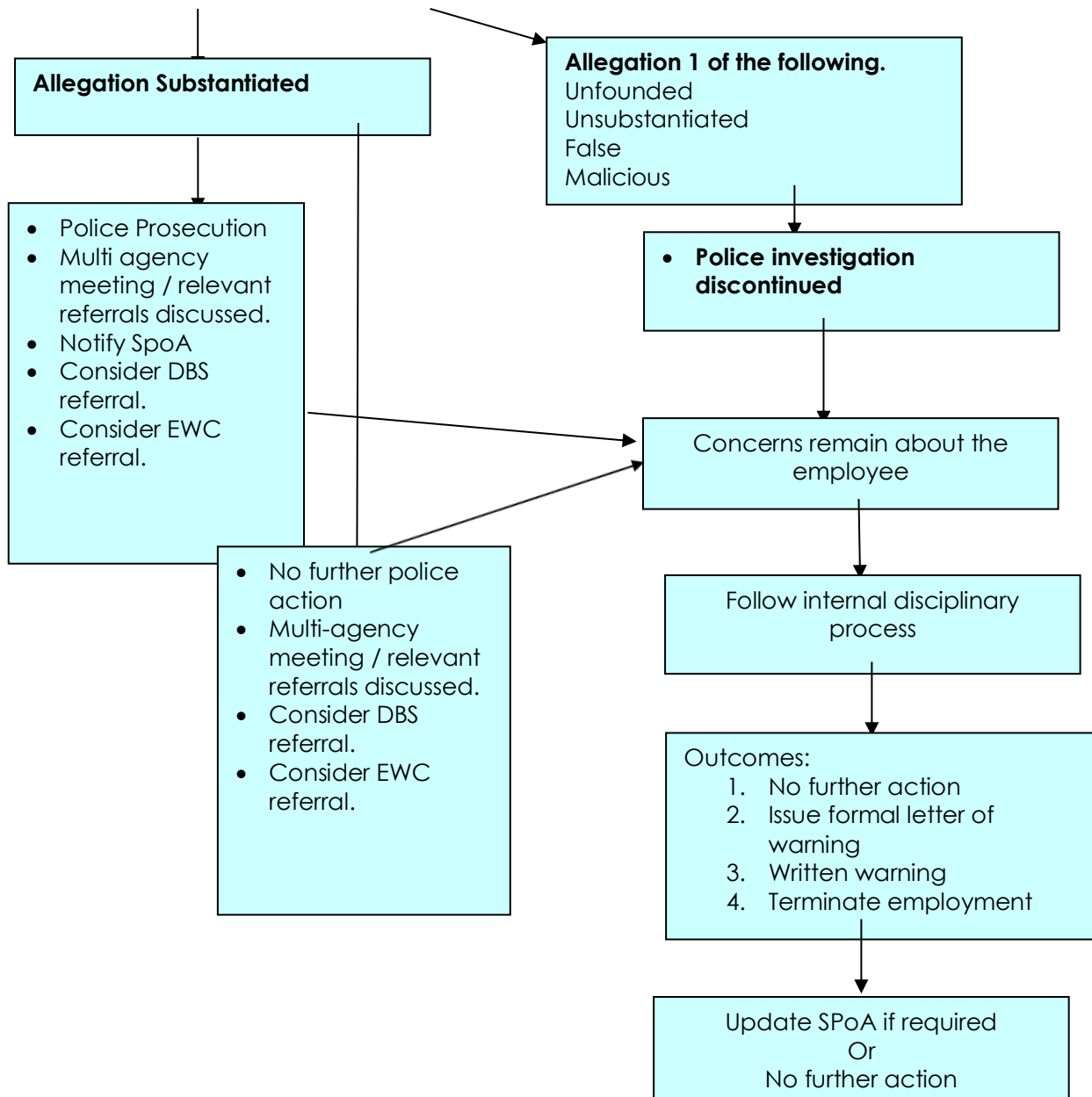
MULTI AGENCY STRATEGY MEETING – Chaired by SPoA/DSP

Possible actions

- Police investigation
- Section 47/Pt 4 inquiry
- Suitability/Internal Management investigation – Share findings with SPOA after investigation.

**Final Strategy Meeting /Outcome
of Investigations**
See Next Page

Relevant investigation
completed.



KEY

SPoA

Single Point of Access (Wales)

DSP

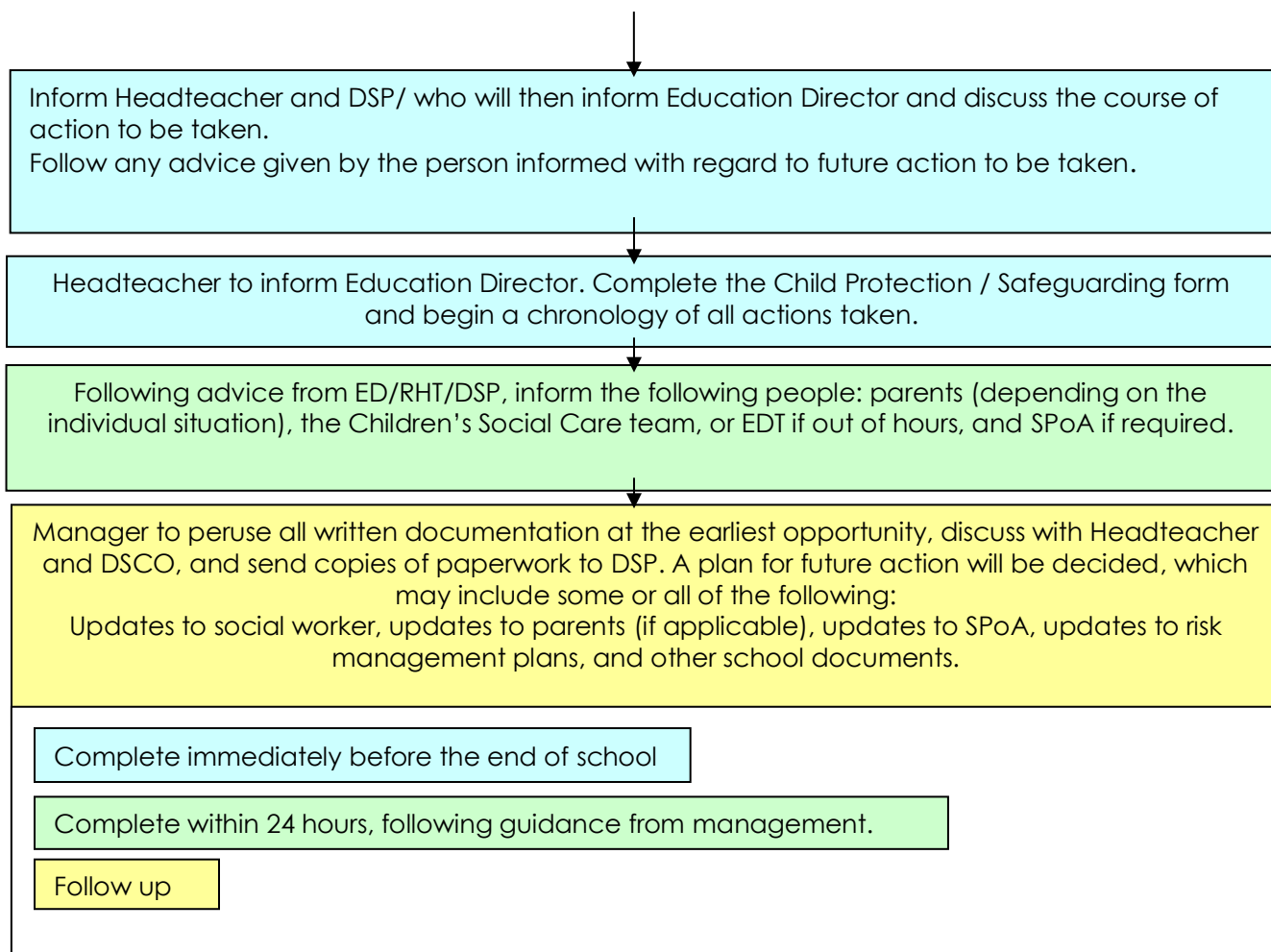
Designated Safeguarding Person

Shining Stars School
and Collage DSP

Designated Safeguarding Person at the Head office

Child safeguarding concerns raised

Ensure safety of young person, offer complaints process, provide first aid if needed.



Appendix 4 - Procedure for dealing with Peer-on-Peer abuse.

When an allegation is made by a child/young person against another, members of staff should consider whether the allegation is a complaint or whether it raises a safeguarding concern. If there is a safeguarding concern the DSP should be informed.

The DSP must alert and report the allegation to the respective social workers of both children and young people involved to assess and determine the way forward. If the allegation indicates that a potential criminal offence has occurred, the police should be contacted at the earliest opportunity, and parents (if applicable) should be informed.

The information and situation should be assessed. This assessment should consider the risks posed, whether they are significant, and whether, to protect children and young people, the alleged perpetrator must be moved from the placement. Any such decision must be risk-assessed and handled sensitively, with due regard for the need to support both the victim and the perpetrator.

The Headteacher and DSP must consider conducting a risk assessment, including a safeguarding risk assessment, to account for any preventive strategies required. This should inform an interim supervision plan. Any supervision plan must address the resources necessary to keep all children and young people safe, including increased staffing. Supervision must be monitored and updated as necessary and should include an evaluation of the plan's effectiveness and a risk assessment.

A record of the allegation must be made, but no attempt at this stage should be made to investigate the circumstances. The records should include details of the date, time, location, and circumstances in which the allegation was made. The record should, as far as possible, be a verbatim account of what the child/young person said. Staff should not 'translate' the child/young person's account into adult language, censor it, or impose their own interpretation of what has been alleged. In addition, it should be legible, clear, concise, and free from jargon and abbreviations.

The Headteacher, DSP, and social worker, with the child/young person's involvement (victim), make decisions about the support they need and the action necessary in respect of the alleged perpetrator.

Where neither Children's Social Care nor the police accept the allegation, the Headteacher and DSP must nevertheless review the situation to determine whether any additional safeguards and support are necessary to promote the welfare of all children and young people.

It is important that the child or young person is kept informed and updated of all actions and progress of the concern/allegation. In conclusion, the child and or young person must be informed of the outcome verbally and confirmed in writing. With a copy of the records placed in their case file.

APPENDIX 5

NSPCC guidance on child protection records retention (England & Wales) states:

Guidance on Retention Periods Type of record	Retention
Child welfare concerns that your organisation refers on to children's social care or the police. For example, this would include concerns about physical, sexual, emotional or neglect of a child, disclosures from a child about being abused or information from a third party which might suggest a child is being abused; concerns about a parent or another adult that uses your organisation, or a young person who has been abused by another young person.	The referral should be acknowledged in writing by children's social care and your organisation keeps this on file. Records should be kept for 6 years after the last contact with the service user unless any of the exemptions apply (listed above) or if your organisation is required to comply with any other statutory requirements.
Child welfare concerns that your organisation decide, after consultation, do not necessitate a referral to children's social care or the police. In such circumstances the organisation should make a record of the concern and the outcome. For example, where a child has been bullied, overly pushy parents or a very distressed child where the distress is unrelated to child abuse.	Destroy the record a year after the child/adult concerned ceases to use the service unless the child or adult are continuing to use your organisation.

Concerns about people (paid and unpaid) who work with children and young people, for example, allegations, convictions, disciplinary action, inappropriate behaviour towards children and young people. For example, where an employee has breached the code of conduct, a record of the behaviour, the action taken, and outcome should be recorded.	Personnel files and training records (including disciplinary records and working time records) - retain for 6 years after employment ceases. However, the records should be retained for a longer period if any of the following apply: There were concerns about the behaviour of an adult who was working with children where s/he behaved in a way that has harmed, or may have harmed, a child. The adult possibly committed a criminal offence against, or related to, a child. The adult behaved towards a child in a way that indicates s/he is unsuitable to work with children. In such circumstances, records should be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.
Disclosure and Barring Service (DBS.) disclosures obtained as part of the vetting process.	The actual disclosure form must be destroyed after 6 months. However, it is advisable that organisations keep a record of the date of the check, the reference number and decision.

Appendix 6

Appendix 6 - Procedures for dealing with incidents of sexting.

Disclosures about sexual imagery can happen in a variety of ways. The child or young person affected may inform a class teacher, a friend, a member of staff, a social worker, a DSP, etc. They may report through a parent or foster household, or directly to the police if they are confident doing so.

All members of staff should be made aware of how to recognise and refer any disclosures of incidents involving sexual imagery. This will be supported through training.

Any direct disclosure by a child or young person must be taken very seriously. A child or young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. Disclosure is likely a last resort, and they may already have tried to resolve the issue themselves. Care must be taken to reassure and support the child or young person.

Initial review meeting

The initial review meeting should consider the evidence and aim to establish:

- Whether there is an immediate risk to the child/young person
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery to safeguard the child/young person, in most cases, imagery should not be viewed.
- 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.

- Whether immediate action should be taken to delete or remove images from devices or online services in consultation with DSP, police, and others.
- Any relevant facts about the children/young people involved which would influence risk assessment.
- Whether to contact parents

An immediate referral to police and/or children's social care should be made if at this initial stage 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)
- Whether the imagery suggests from information obtained that the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts.
- You have reason to believe a child/young person 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.

The decision not to involve the police and children's social care should only be made if the DSP is confident that:

None of the above factors applies. If this is the case, the Headteacher and or DSP may decide to respond to the incident without involving the police, but should alert the social worker to the concern for their consideration. However, all staff and fostering households must be mindful that if further information/concerns come to light, the incident could be escalated.

The decision to respond to the incident without involving the police or children's social care would be made when the DSP is confident they have sufficient information to assess the risks to the children and young people involved, and that these risks can be managed with support and the activation of the behaviour management procedures.

The decision should be made by the DSP, with input from the Headteacher and other members of staff where appropriate. The decision should be recorded in line with our school reporting and recording policy, and the information should be entered into the children/young people's case file.

Cross Reference

Anti-Bullying Policy
 Equality and Diversity Policy
 Code of Conduct
 Whistle-Blowing Policy
 Disciplinary Policy
 Child Sexual Exploitation Policy
 Safer Recruitment and Retention Policy