

# DALRIADA SCHOOL POLICY DOCUMENT

Reviewed: January 2026

Review Date: May 2026



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## SAFEGUARDING AND CHILD PROTECTION

### 1. Introduction

We in Dalriada School have a primary responsibility for the care, welfare and safety of the pupils in our charge, and we will carry out this duty through our pastoral care policy, which aims to provide a caring, supportive and safe environment, valuing individuals for their unique talents and abilities, in which all our young people can learn and develop to their full potential. One way in which we seek to protect our pupils is by helping them learn about the risks of possible abuse, helping them to recognise unwelcome behaviour in others and acquire the confidence and skills they need to keep themselves safe.

All our staff and volunteers have been subject to appropriate background checks. The staff of our school have also adopted a Code of Practice for our behaviour towards pupils. This Code is set out in the staff handbook section 4.04c and Appendix 1 of this policy. Safe recruitment procedures will be followed for those working/volunteering with young people including;

- completing an information/application form that enables the applicant to self declare any previous offences and,
- completing an AccessNI check for those working with or responsible for children or young people.

The purpose of the following procedures on Child Protection is to protect our pupils by ensuring that everyone who works in our school (teachers, non-teaching staff and volunteers) has clear guidance on the action which is required where abuse or neglect of a child is suspected. The overriding concern of all caring adults must be the care, welfare and safety of the child, and the welfare of each child is our paramount consideration. The problem of child abuse will not be ignored by anyone who works in our school, and we know that some forms of child abuse are also a criminal offence. Staff and volunteers will be provided with the appropriate safeguarding training. A record of attendance will be maintained.

### 2. Safeguarding Team

The following are members of our school Safeguarding Team:

- Prof J Gillespie (Chair of the Board of Governors)
- Mrs E McCollum (Designated Governor for Child Protection)
- Mrs L Aitcheson (Principal)
- Ms L Crawford (Designated Teacher)
- Dr I Walker (Deputy Designated Teacher)
- Mr S Glenn (SENCO)

### **3. ROLES AND RESPONSIBILITIES**

#### **The Board of Governors**

The Chairperson of the Board of Governors plays a pivotal role in creating and maintaining the safeguarding ethos within the school environment.

In the event of a safeguarding or child protection complaint being made against the Principal, it is the Chairperson who must assume lead responsibility for managing the complaint/allegation in keeping with guidance issued by the Department (and relevant guidance from other Departments when it comes to other early years settings), employing authorities, and the school's own policies and procedures.

The Chairperson is responsible for ensuring child protection records are kept and for signing and dating annually the Record of Child Abuse Complaints against staff members even if there have been no entries.

#### **The Board of Governors must ensure that:**

- The Board of Governors delegates a specific member of the governing body to take the lead in safeguarding and child protection issues.
- A Designated Governor for Child Protection is appointed.
- A Designated and Deputy Designated Teacher are appointed in their schools.
- They have a full understanding of the roles of the Designated and Deputy Designated Teachers for Child Protection.
- Safeguarding and child protection training is given to all staff and governors including refresher training.
- Relevant safeguarding information and guidance is disseminated to all staff and governors with the opportunity to discuss requirements and impact on roles and responsibilities.
- The school has a Safeguarding and Child Protection Policy which is reviewed annually and parents and pupils receive a copy of the policy
- The school has an Anti-Bullying Policy which is reviewed at intervals of no more than four years and maintains a record of all incidents of bullying or alleged bullying.
- The school ensures that other safeguarding policies are reviewed at least every 3 years or as specified in relevant guidance.
- There is a code of conduct for all adults working in the school.
- All school staff and volunteers are recruited and vetted, in line with DE Circular 2012/19.
- They receive a full annual report on all child protection matters.
- The school maintains the following child protection records in line with DE Circulars 2015/13 Dealing with Allegations of Abuse Against a Member of Staff and 2020/07 Child Protection: Record Keeping in Schools: Safeguarding and child protection concerns; disclosures of abuse; allegations against staff and actions taken to investigate and deal with outcomes; staff induction and training.

#### **Designated Teacher (DT) for Child Protection**

Every school is required to have a Designated Teacher and Deputy Designated Teacher with responsibility for safeguarding and child protection. These are highly skilled roles developed and supported through a structured training programme, requiring knowledge and professional judgement on complex and emotive issues. The role involves:

- The induction and training of all school staff including support staff.
- Being available to discuss safeguarding or child protection concerns of any member of staff.
- Having responsibility for record keeping of all child protection concerns.
- Maintaining a current awareness of early intervention supports and other local services eg Family Support Hubs.
- Making referrals to Social Services or PSNI where appropriate.
- Liaison with the EA Designated Officers for Child Protection.
- Keeping the Principal informed.
- Taking the lead responsibility for the development of the school's Safeguarding and Child Protection policy.
- The promotion of a safeguarding and child protection ethos in the school.
- Compiling written reports to the Board of Governors regarding child protection

### **Deputy Designated Teacher (DDT) for Child Protection**

The role of the DDT is to work co-operatively with the DT in fulfilling his/her responsibilities. It is important that the DDT works in partnership with the DT so that he/she develops sufficient knowledge and experience to undertake the duties of the DT when required. DDTs are also provided with the same specialist training by CPSS to help them in their role.

### **The Principal**

The Principal, as the Secretary to the Board of Governors, will assist the Board of Governors to fulfil its safeguarding and child protection duties, keeping them informed of any changes to guidance, procedure or legislation relating to safeguarding and child protection, ensuring any circulars and guidance from DE are shared promptly, and termly inclusion of child protection activities on the Board of Governors meeting agenda. In addition, the Principal takes the lead in managing child protection concerns relating to staff.

The Principal has responsibility for establishing and managing the safeguarding and child protection systems within the school. This includes the appointment and management of suitable staff to the key roles of DT and DDT Designated Teacher posts and ensuring that new staff and volunteers have safeguarding and child protection awareness sessions as part of an induction programme.

The Principal must ensure that parents and pupils receive a copy, or summary, of the Child Protection Policy at intake and, at a minimum, every two years.

### **Other Members of School Staff**

- Members of staff **must** refer concerns or disclosures initially to the Designated Teacher for Child Protection or to the Deputy Designated Teacher if he/she is not available.
- Members of staff should complete the Note of Concern (**See Appendix 4**) if there are safeguarding concerns such as: poor presentation, changed or unusual behaviour including self-harm and suicidal thoughts, deterioration in educational progress,

discussions with parents about concerns relating to their child, concerns about pupil abuse or serious bullying and concerns about home circumstances including disclosures of domestic abuse.

- Staff should not give children a guarantee of total confidentiality regarding their disclosures, should not investigate nor should they ask leading questions.

## Parents

The primary responsibility for safeguarding and protection of children rests with parents who should feel confident about raising any concerns they have in relation to their child.

Parents can play their part in safeguarding by informing the school:

- If the child has a medical condition or educational need.
- If there are any Court Orders relating to the safety or wellbeing of a parent or child.
- If there is any change in a child's circumstances for example - change of address, change of contact details, change of name, change of parental responsibility.

It is essential that the school has up to date contact details for the parent/carer.

## 4. What is child abuse?

As outlined in Co-Operating to Safeguard Children and Young People In Northern Ireland, 2016 there are six areas of abuse.

**Neglect** – is the failure to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter that it likely to result in the serious impairment of a child's health or development. The six categories of neglect include:

- Physical
- Medical
- Emotional
- Educational
- Nutritional
- Lack of supervision of guidance

Children who are neglected often also suffer from other types of abuse.

**Physical abuse** is deliberately physically hurting a child. It might take a variety of different forms, including hitting, biting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

**Sexual abuse** occurs when others use and exploit children sexually for their own gratification or gain to the gratification of others. Sexual abuse 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 clothes). It may include non-contact activities involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in a sexually inappropriate way or grooming a child in preparation for abuse

(including via e-technology). Sexual abuse is not solely perpetrated by adult males, woman can commit acts of sexual abuse, as can other children.

**Emotional abuse** is the persistent emotional maltreatment of a child. It is sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. It may involve deliberately telling a child that they are worthless, or unloved or inadequate. It may include not giving a child opportunity to express their view, deliberately silencing them, or 'making fun' of what they say or how they say it, Emotional abuse may involve bullying – including online bullying through social networks, online games or mobile phones.

**Exploitation** is the intentional ill-treatment, manipulation or abuse of power and control over a child to take selfish or unfair advantage of a child or situation for personal gain. It may manifest itself in many forms such as child sexual exploitation, child labour, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud of child trafficking.

**Domestic Abuse** is the threatening, controlling, coercive behaviour, violence or abuse (psychological, virtual, physical, verbal, sexual, financial or emotional) inflicted on anyone (irrespective of age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability) by a current or former partner or family member. This also includes coercive, exploitative and harmful behaviour that included taking advantage of an individual's capacity to give informed consent.

### **Operation Encompass**

We are an Operation Encompass school. Operation Encompass is an early intervention partnership between local Police and our school, aimed at supporting children who are victims of domestic violence and abuse. As a school, we recognise that children's exposure to domestic violence is a traumatic event for them.

Children experiencing domestic abuse are negatively impacted by this exposure. Domestic abuse has been identified as an Adverse Childhood Experience and can lead to emotional, physical and psychological harm. Operation Encompass aims to mitigate this harm by enabling the provision of immediate support. This rapid provision of support within the school environment means children are better safeguarded against the short, medium and long-term effects of domestic abuse.

As an Operation Encompass school, when the police have attended a domestic incident and one of our pupils is present, they will make contact with the school at the start of the next working day to share this information with a member of the school safeguarding team. This will allow the school safeguarding team to provide immediate emotional support to this child as well as giving the designated teacher greater insight into any wider safeguarding concerns.

This information will be treated in strict confidence, like any other category of child protection information. It will be processed as per DE Circular 2020/07 'Child Protection

Record Keeping in Schools' and a note will be made in the child's child protection file. The information received on an Operation Encompass call from the Police will only be shared outside of the safeguarding team on a proportionate and need to know basis. All members of the safeguarding team will complete online Operation Encompass training, so they are able to take these calls. Any staff responsible for answering the phone at school will be made aware of Operation Encompass and the need to pass these calls on with urgency to a member of the Safeguarding team.

Further information see [The Domestic Abuse Information Sharing with Schools etc. Regulations \(Northern Ireland\) 2022.](#)

**Female Genital Mutilation (FGM)** is a form of child abuse and violence against women and girls. FGM involves all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The procedure is also referred to as 'cutting', 'female circumcision' and 'initiation'. FGM is a form of child abuse and, as such, teachers have statutory duty to report cases (Criminal Law Act (NI) 1967 Section 5 makes it an offence to fail to report a relevant offence), including suspicion, to the appropriate agencies, through the school reporting procedures. Where there is a concern that a child or young person may be at immediate risk of FGM this must be reported to the PSNI without delay (Sexual Referral Unit 02890259299). Where there is a concern that a child or young person may be at risk of FGM, referral should be made to the relevant HSCT Gateway Team.

Schools have statutory responsibilities under the:

- Education and Libraries (NI) Order 2003 Article 17
- Female Genital Mutilation Act 2003
- Serious Crime Act 2015

## **Signs and symptoms**

The recognition and identification of child abuse can be difficult. Teachers are not expected to be experts in this field. However, for guidance the following list of signs and symptoms is reprinted from the Inter-Agency guidelines sections 5.5, 5.6, 5.7, 5.8 and 5.9.

### **Physical Injury**

Most injuries to children are accidental and can be explained simply. Children receive bumps and bruises as a result of the rough and tumble of normal play.

It is important to remain aware however, that injuries may not have been accidental in origin. The presence of the following factors should raise concern.

- (a) Where the explanation is not consistent with the injury or with the stage of development of the child.
- (b) Any bruising in a child who has not attained mobility is of concern, as is a child's reluctance to move limb(s) or where there is tenderness on touching the child.
- (c) Where there are changes of explanation or no explanation.
- (d) Where there has been an unreasonable delay in seeking medical advice.

- (e) Where there is a history of frequently repeated injury even though the explanation of each individual occurrence appears adequate. This may indicate a lack of supervision or possible medical problems.
- (f) Where there are bruises of different ages on the child at any one time, other than on the common sites of accidental injury in a child of that age.
- (g) Where there is facial bruising, particularly round the mouth, eyes or ears.
- (h) Where there are unexplained or inadequately explained burns, bite marks, severe bruising or any combination of these.
- (i) Poisoning, particularly if there is more than one incident.

### **Neglect**

Neglect results from the **persistent failure** to meet the basic needs of the child. This may include failure to provide food, warmth, clothing, appropriate stimulation or consistent caretaking resulting in impairment of the child's health or development.

#### **The signs in the child of neglect may include:**

- (a) Failure to thrive, where medical investigation has excluded any medical reason for the problem.
- (b) Food stealing or gorging of food.
- (c) Lack of appetite and increased feeding difficulties.
- (d) Inappropriate or inadequate clothing or hygiene, (taking account of cultural norms and family means).
- (e) Lack of appropriate supervision.
- (f) Persistent failure to seek or to follow any necessary medical or nursing advice.
- (g) Developmental delay.
- (h) Poor academic attainment or school attendance.
- (i) Poor peer group relationships, but attention-seeking from adults.
- (j) Physical signs of long-standing neglect, including poor growth, thinning hair, protuberant abdomen and persistently cold, reddened hands and feet.

### **Sexual Abuse**

Many of the signs and behaviours associated with sexual abuse can be found in some medical or emotional conditions. A good rule to follow is that when there are worries about a child's behaviour which cannot be explained satisfactorily, sexual abuse should be borne in mind as a possible explanation. A child who alleges sexual abuse should be listened to carefully and the listener should consult with appropriate professionals immediately (e.g. Gateway Team, PSNI, and Paediatrician) for advice. Sexually abused children are frequently obedient to adults and anxious to please but peer-group relationships are often poor. Many children are asymptomatic, particularly in the younger age range. Other signs which may be present are:

#### **(a) Physical signs:**

- Genital or anal lacerations, bleeding or other trauma;
- Genital or peri-anal inflammation or irritation;
- Persistent or recurrent vaginal discharge;
- Sexually transmitted disease, including peri-anal or genital warts;
- Pregnancy.

#### **(b) Medical problems which may be connected with sexual abuse:**

- Recurrent urinary tract infections or 'cystitis';

Secondary enuresis or encopresis (wetting or soiling);  
Recurrent unexplained abdominal pain.

***It should be remembered that for many children these symptoms will be present and are not always associated with abuse.***

**(c) Behavioural problems may include:**

In younger children -  
over sexualised behaviour;  
compulsive masturbation;  
acting out and aggressive behaviour;  
drawings or play activity which are explicitly sexual.

At any age - a sudden change in normal behaviour patterns, or a sexual awareness and knowledge well in advance of what would be expected at the child's level of development, may be an indicator of sexual abuse.

Children who are being sexually abused do not necessarily display any behavioural disturbance.

**Emotional Abuse**

There are elements of emotional harm in all forms of abuse. Whilst physical care and environments may appear to meet children's needs it is important to remain aware of the interactions and relationship which occur between children and their carers. An emotionally abused child may be subjected to constant criticism and scape-goating, the continuous withholding of approval and affection, severe discipline or a total lack of appropriate control.

Alternatively, the child may be exploited to fulfil the parent's emotional needs.

As a consequence, the child may:

- (a) Have an impaired ability for enjoyment and play.
- (b) Lack curiosity and natural exploratory behaviour.
- (c) Be delayed in language development and play skills.
- (d) Have a low self-esteem and feeling of worthlessness.
- (e) Show eating disturbances or growth failure.
- (f) Severe cases may show physical signs of deprivation as described under **Neglect**. These may occur even when physical care appears adequate.

In older children - withdrawn, overtly compliant behaviour;  
depression and suicidal behaviour;  
self-mutilation;  
running away;  
school refusal;  
truancy;  
drug and alcohol abuse.

**Exploitation (Child Sexual Exploitation)**

Young people who are being sexually exploited may:

- a) go missing from home, care or education.
- b) be involved in abusive relationships, intimidated and fearful of certain people or situations

- c) hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- d) associate with other young people involved in sexual exploitation
- e) get involved in gangs, gang fights, gang membership
- f) have older boyfriends or girlfriends
- g) spend time at places of concern, such as hotels or known brothels
- h) not know where they are, because they have been moved around the country
- i) be involved in petty crime such as shoplifting
- j) have unexplained physical injuries
- k) have a changed physical appearance, for example lost weight
- l) have unexplained gifts (e.g. mobile phone)

### **Domestic Abuse/Violence:**

Children who witness domestic abuse may:

- a) become aggressive
- b) display anti-social behaviour
- c) suffer from depression or anxiety
- d) not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

**It should be remembered that for many children some of these symptoms will be present and are not always associated with abuse.**

## **5. Children with Increased Vulnerabilities**

Some children have increased risk of abuse due to specific vulnerabilities such as disability or a lack of fluency in English.

- **Children With a Disability**

Children and young people with disabilities (i.e. any child or young person who has a physical, sensory or learning impairment or a significant health condition) may be more vulnerable to abuse and those working with children with disabilities should be aware of any vulnerability factors associated with risk of harm, and any emerging child protection issues.

Staff must be aware that communication difficulties can be hidden or overlooked making disclosure particularly difficult. Staff and volunteers working with children with disabilities will receive training (when necessary) to enable them to identify and refer concerns early in order to allow preventative action to be taken.

- **Children With Limited Fluency in English**

Children whose first language is not English/Newcomer pupils should be given the opportunity to express themselves to a member of staff or other professional with appropriate language/communication skills, especially where there are concerns that abuse may have occurred. The Designated Teacher will seek advice and support from the EA's Intercultural Education Service if necessary.

Dalriada School will aim to create an atmosphere in which pupils with special educational needs which involve communication difficulties, or pupils for whom English is not their first language, feel confident to discuss these issues or other matters that may be worrying them.

## **6. Adult Safeguarding**

An ‘**Adult at risk of harm**’ is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:

- a) Personal characteristics and/or
- b) Life circumstances

Personal characteristics may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain.

Life circumstances may include, but are not limited to, isolation, socio-economic factors and environmental living conditions.

An ‘**Adult in need of protection**’ is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:

- a) Personal characteristics and/or
- b) Life circumstances and
- c) Who is unable to protect their own well-being, property, assets, rights or other interests; and
- d) Where the action or inaction of another person or persons is causing, or is likely to cause, him/her to be harmed.

## **7. Bullying**

Persistent bullying can be a distressing and damaging form of abuse and is not tolerated in our school. All staff are vigilant at all times to the possibility of bullying occurring, and will take immediate steps to stop it happening, to protect and reassure the victim and to discipline the bully. Further guidance for staff and parents is set out in our Anti-Bullying Policy. Any allegation of bullying will be investigated under our Anti-Bullying Policy. If it is deemed that the bullying is putting the child at risk and is a child protection issue, the Safeguarding and Child Protection procedures (see below) must then be followed.

## **8. Responding to Safeguarding and Child Protection Concerns**

Safeguarding is more than child protection. Safeguarding begins with promotion and preventative activity which enables children and young people to grow up safely and securely in circumstances where their development and wellbeing is not adversely affected. It includes support to families and early intervention to meet the needs of children and continues through to child protection. Child protection refers specifically to the activity that is undertaken to protect individual children or young people who are suffering or are likely to suffer significant harm.

### **How a Parent Can Raise a Concern? (see Appendix 3)**

In Dalriada we aim to work closely with parents/guardians in supporting all aspects of their child’s development and well-being. Any concerns a parent may have will be taken seriously and dealt with in a professional manner.

If a parent has a concern they can talk to the Form Tutor or Head of Year, the Designated or Deputy Designated Teacher or the Principal. If they are still concerned they may write to the Chair of the Board of Governors.

At any time a parent may talk to a social worker in the local Gateway team or to the PSNI Central Referral Unit.

### **Procedures for reporting suspected (or disclosed) child abuse (see Appendix 2 and 3)**

<p><b><u>Designated Teachers for Child Protection</u></b></p> <p>In Dalriada School the designated teachers are:</p> <p>Ms. L. Crawford Dr. I.T.G. Walker (Deputy)</p>
<p><b><u>Designated Governor for Child Protection</u></b></p> <p>Mrs E McCollum</p>

In Dalriada if a child makes a disclosure to a teacher or other member of staff which gives rise to concerns about possible abuse, or if a member of staff has concerns about a child, the member of staff will complete a Note of Concern (see **Appendix 4**) and act promptly. **They will not investigate** - this is a matter for Social Services - but will discuss these concerns with the Designated Teacher or with the Deputy Designated Teacher if he/she is not available.

The Designated Teacher will consult with the Principal or other relevant staff always taking care to avoid due delay. If required advice may be sought from the Education Authority Designated Officer for Child Protection. The Designated Teacher may also seek clarification from the child or young person and/or their parent/carer.

If a child protection referral is not required the school may consider other options including monitoring, signposting or referring to other support agencies e.g. Family Support Hub with parental consent and, where appropriate, with the child/young person's consent.

If there are concerns that the child may be at risk, the school is obliged to make a referral. If a child protection referral is required, the Designated Teacher will seek consent from the parent/carer and/or the child unless this would place the child at risk of significant harm.

The Designated Teacher will phone the Gateway team and/or the PSNI and will submit a completed UNOCINI referral form.

If a complaint about possible child abuse is made against a member of staff, the Principal (or the designated teacher, if he is not available) must be informed immediately. The above procedures will apply (unless the complaint is about the designated teacher). Where the matter is referred to Social Services, the member of staff will be removed from duties involving direct contact with pupils, and may be suspended from duty as a precautionary measure pending investigation by Social Services. The Chairman of the Board of Governors will be informed immediately.

If a complaint is made against the Principal, the designated teacher (or her deputy, if she is not available) must be informed immediately. She will inform the Chairman of the Board of

Governors and together they will ensure that the necessary action is taken.

If any member of staff feels unsure about what to do if he/she has concerns about a child, or unsure about being able to recognise the signs or symptoms of possible abuse, he/she should speak to the designated teacher.

## **9. Relevant Policies**

Policies to be used in conjunction with this policy:

- Pastoral Care
- Anti-Bullying
- Attendance
- Drugs Education
- Health and Safety
- Staff Code of Conduct
- Intimate Care
- SEN
- Use of reasonable force
- E-Safety
- Confidentiality
- Relationships and Sexuality
- Positive Behaviour

## **10. MONITORING AND EVALUATION**

This policy has been approved by the Board of Governors for dissemination to parents, pupils and staff and will be reviewed annually by the Safeguarding Team. It will be implemented through the school's staff induction and training programme and as part of day to day practice. Compliance with the policy will be monitored on an on-going basis by the Designated Teacher for Child Protection and periodically by the Schools Safeguarding Team. The Board of Governors will also monitor child protection activity and the implementation of the Safeguarding and Child Protection policy on a regular basis through the provision of reports from the Designated Teacher.

**Adopted by the Board of Governors on 26/01/23**  
**Reviewed by Safeguarding Team 22/05/25**

## **Appendix 1**

### **A Code of Conduct for Employees within Dalriada School**

#### **Introduction**

All actions concerning children and young people must uphold the best interests of the young person as a primary consideration. Staff must always be mindful of the fact that they hold a position of trust, and that their behaviour towards the children and young people in their charge must be above reproach. This Code of Conduct is not intended to detract from the enriching experiences children and young people gain from positive interaction with school staff. It is intended to assist staff in respect of the complex issue of safeguarding, by drawing attention to the areas of risk for staff and by offering guidance on prudent conduct.

#### **Code of Conduct**

##### **1. Private Meetings with Pupils**

- a) Staff should be aware of the dangers which may arise from private interviews with individual pupils. It is recognised that there will be occasions when confidential interviews must take place. As far as possible, staff should conduct such interviews in a room with visual access, or with the door open.
- b) Where such conditions cannot apply, staff are advised to ensure that another adult knows that the interview is taking place. It may be necessary to use a sign indicating that the room is in use, but it is not advisable to use signs prohibiting entry to the room.
- c) Where possible another pupil or (preferably) another adult should be present or nearby during the interview, and the school will take active measures to facilitate this.
- d) Staff should not conduct private tutoring on school premises.

##### **2. Physical Contact with Pupils**

- a) As a general principle, staff are advised not to make unnecessary physical contact with their pupils.
- b) It is unrealistic and unnecessary, however, to suggest that staff should touch pupils only in emergencies. In particular, a distressed child, especially a younger child, may need reassurance involving physical comforting, as a caring parent would provide. Staff should not feel inhibited from providing this.
- c) Staff should never touch a child who has clearly indicated that he/she is, or would be, uncomfortable with such contact, unless it is necessary to protect the child, others or property from harm. Further guidance is given in the school policy on the use of reasonable force to restrain or control pupils (Staff Handbook 5.5a) and in DENI Circular 1999/9.
- d) Physical punishment is illegal, as is any form of physical response to misbehaviour, unless it is by way of necessary restraint.
- e) Staff who have to administer first-aid to a pupil should ensure wherever possible that this is done in the presence of other children or another adult. However, no member of staff should hesitate to provide first-aid in an emergency simply because another person is not present.
- f) Any physical contact which would be likely to be misinterpreted by the pupil, parent or other casual observer should be avoided.

- g) Following any incident where a member of staff feels that his/her actions have been, or may be, misconstrued, a written report of the incident should be submitted immediately to the Designated or Deputy Designated Teacher for Child Protection.
- h) Staff should be particularly careful when supervising pupils in a residential setting, or in approved out of school activities, where more informal relationships tend to be usual and where staff may be in proximity to pupils in circumstances very different from the normal school/work environment.

### **3. Social Media**

The school strongly recommends that no member of staff should use social networking sites to communicate with pupils. If a teacher wishes to use social networking sites, prior permission must be sought from the Principal or Deputy Principals. When using social networking sites, staff are expected to uphold the values and ethos of Dalriada School and at all times safeguard the reputation of the school.

### **4. Choice and Use of Teaching Materials**

- a) Teachers should avoid teaching materials, the choice of which might be misinterpreted and reflect upon the motives for the choice.
- b) When using teaching materials of a sensitive nature a teacher should be aware of the danger that their application, either by pupils or by the teacher, might after the event be criticised. Guidelines are set out in schemes of work and in various school policies, e.g. Relationships and Sexuality Education and Drugs Education.
- c) If in doubt about the appropriateness of a particular teaching material, the teacher should consult with the Principal or his Deputies before using it.

### **5. Relationships and Attitudes**

Staff should ensure that their relationships with pupils are appropriate to the age, maturity and sex of the pupils, taking care that their conduct does not give rise to comment or speculation. Dress, attitudes, demeanour and language all require care and thought, particularly when staff are dealing with adolescent boys and girls.

### **Conclusion**

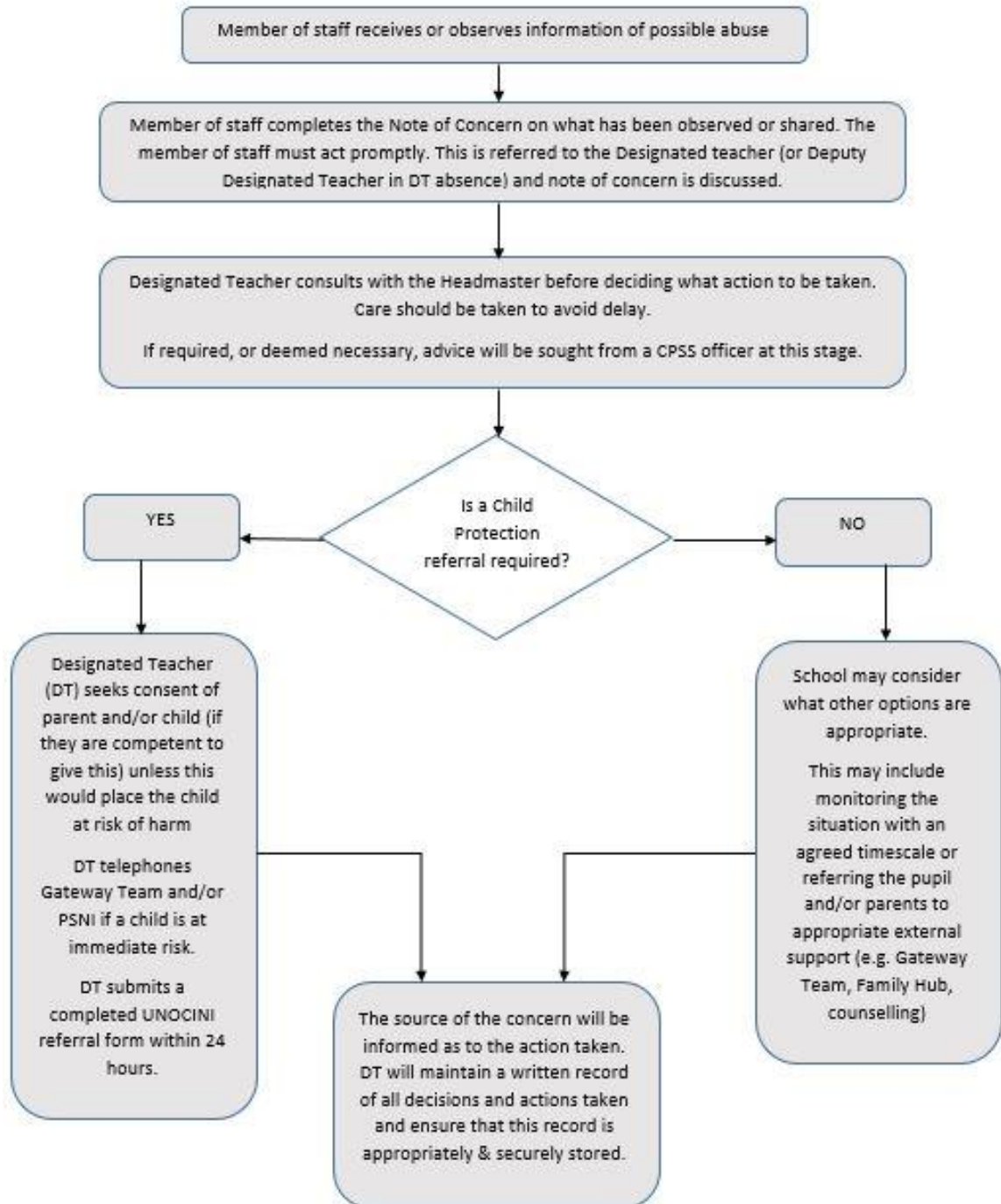
It would be impossible and inappropriate to lay down hard and fast rules to cover all the circumstances in which staff interrelate with children and young people, or where opportunities for their conduct to be misconstrued might occur.

In all circumstances, employees' professional judgement will be exercised and for the vast majority of employees this Code of Conduct will serve only to confirm what has always been their practice. If employees have any doubts about points in the Code of Conduct, or how they should act in particular circumstances, they should consult the Principal, the Designated Teacher for Child Protection or a representative of their professional association.

From time to time, however, it is prudent for all staff to reappraise their teaching styles, relationships with children/young people and their manner and approach to individual children/young people, to ensure that they give no grounds for doubt about their intentions, in the minds of colleagues, of children/young people or of their parents/guardians

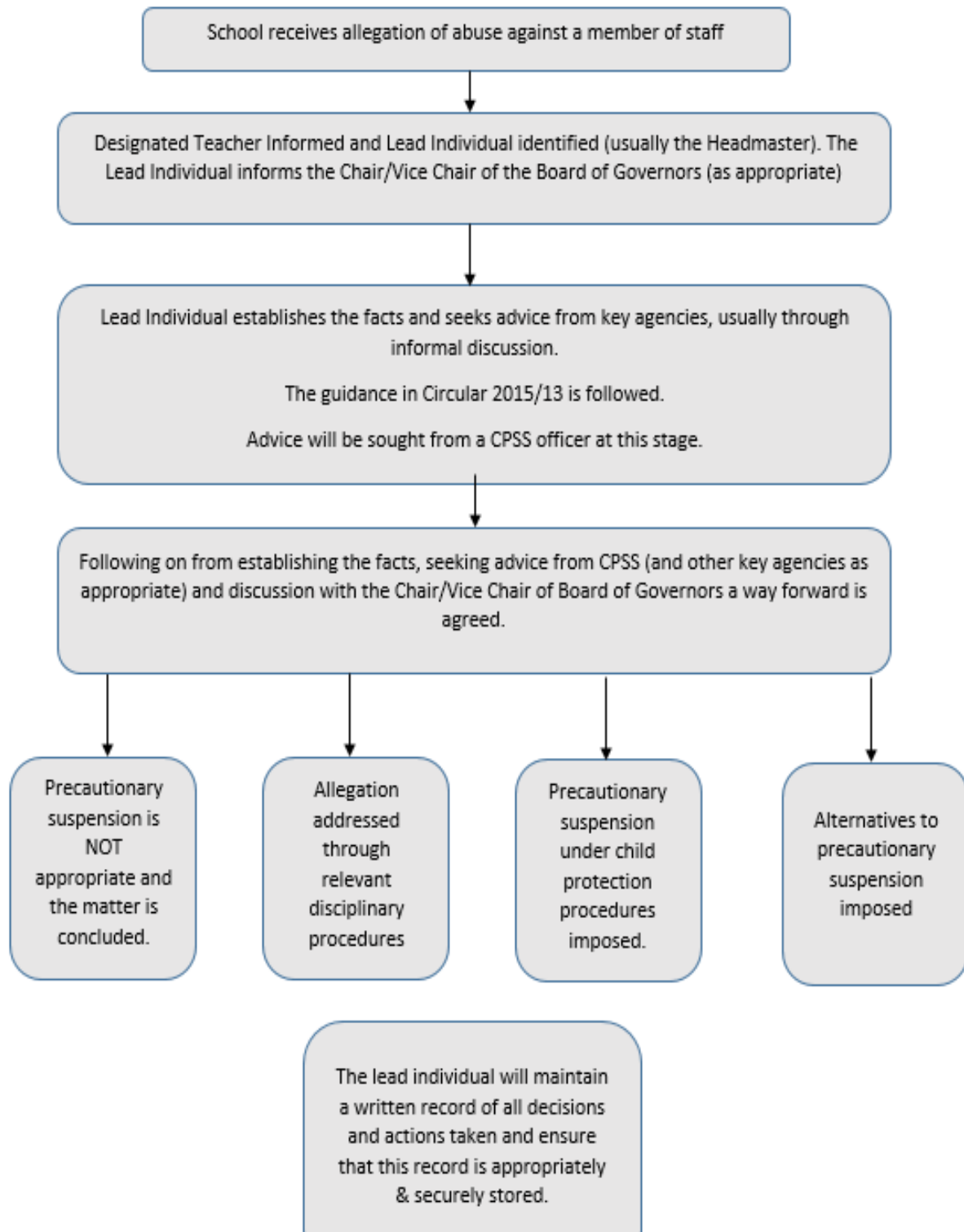
## Appendix 2

Procedures where the school has concerns, or has been given information about a possible abuse by someone other than a member of staff.



### Appendix 3

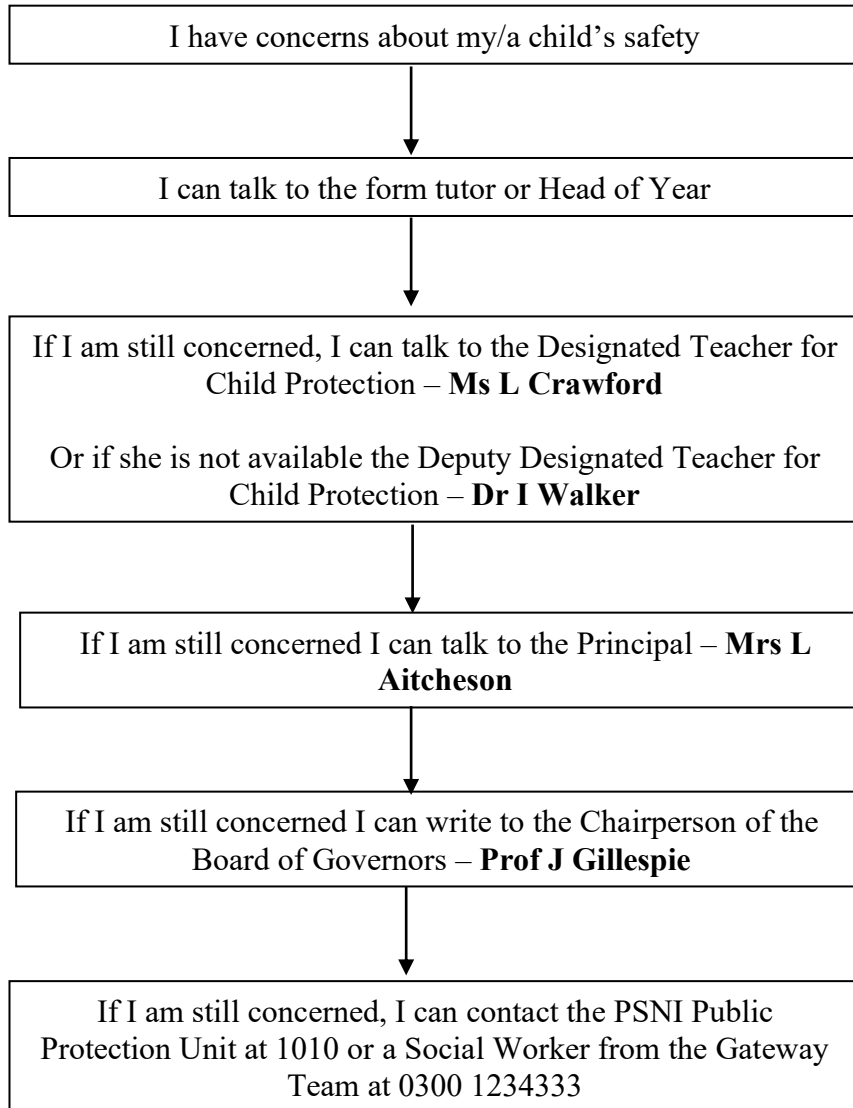
#### Dealing with allegations of abuse against a member of staff



## Appendix 4

### Advice for Parents

If you have concerns regarding Safeguarding or Child Protection the procedure to follow is outline below.



**Appendix 5**

**C O N F I D E N T I A L**

**NOTE OF CONCERN**

Child Protection Record - Reports to Designated Teacher

Name of Pupil:
Year Group:
Date, Time of incident/disclosure:
Circumstances of incident/disclosure:
Nature and description of concern:
Parties involved, including any witnesses to an event and what was said or done and by whom:

Action taken at the time:

Details of any advice sought, from whom and when:

Any further action taken:

Written report passed to Designated Teacher:

Yes  No

If 'No' state reason:

Date and time of report to the Designated Teacher:

Written note from staff member placed on pupil's Child Protection file

If 'No' state reason:

Name of staff member making the report: \_\_\_\_\_

Signature of Staff Member: \_\_\_\_\_ Date: \_\_\_\_\_

Signature of Designated Teacher: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix 6

# Operation Encompass Data Protection Guidance and Template DPIA for Schools

## Introduction

Operation Encompass is a partnership between the Police Service of Northern Ireland, the Education Authority and schools aimed at supporting children who witness domestic violence or abuse in the home. Whilst schools have protocols and procedures in place for processing any information disclosed to them in relation to safeguarding, Operation Encompass is a new initiative focusing on the routine sharing of information relating to domestic violence or abuse in line with **The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022**.

The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022 set out a procedure for sharing this information with schools. If the Police attend a domestic abuse call out where children are present, they will contact the child's school as early as possible the next morning to share this information with their safeguarding team. Schools will then process this information in the same way they process all information received relating to safeguarding concerns. The complete DE Circular 2020/07 entitled *Child Protection: Record Keeping In Schools* can be found [here](#).

This guidance document has been produced to ensure schools can confidently process information in relation to Operation Encompass in compliance with the Data Protection Act 2018 (“**DPA 2018**”) and the UK General Data Protection Regulation (“**GDPR**”). This guidance document includes a template Data Protection Impact Assessment (DPIA) for use by schools. Schools should insert their school's name at the beginning of the template DPIA and it should be signed off by the school's principal in the sign-off section at the end. A copy of the completed DPIA signed off by the principal should be retained for accountability purposes. All schools should ensure that the principal, designated teacher and other relevant staff have read this guidance document and the DPIA.

## RECORDS MANAGEMENT

Information received by schools as part of Operation Encompass will be processed in the same way all Child Protection Records are processed in accordance with DE Circular 2020/07- Child Protection: Record Keeping in Schools. The full circular can be found [here](#). Some important information is provided below for ease of reference.

## STORAGE OF CHILD PROTECTION INFORMATION

Child Protection information is confidential and should **not** be kept on the child's Pupil/Educational Record. Each school should have a separate secure confidential filing system for Child Protection concerns, ideally in a fireproof filing cabinet for physical records, or securely in an electronic or online/cloud based system with restricted access and appropriate password protections. Other child protection records, including the school's confidential Record of Child Abuse Complaints should also be stored here. The filing system, whether

physical or electronic, should be accessible to only the DT (Designated Teacher), DDT (Deputy Designated Teacher) or Principal. The secure filing cabinet for physical records or secure electronic or online/cloud based system for electronic records is not accessible to anyone else, including administrative staff, the Education Training Inspectorate (ETI) and members of the Board of Governors. The ETI will seek assurance that child protection records are held securely and in a confidential manner.

Physical or electronic Child Protection Records must not be removed from the school premises, except when taken to a case planning meeting in respect of the child, on foot of a court order, when a child transfers to a new school and there are Child protection concerns or when there is a Case Management Review/Domestic Homicide Review. If information needs to be taken out of the school, it must be transported securely and a record should be kept of when it was removed, by whom, for what purpose, and when it was returned. Any computing devices or data storage (including laptops, tablets, USB drives etc.) used to transport electronic Child Protection Records in the circumstances referred to above should be encrypted and password protected.

## **ACCESS TO RECORDS AND SHARING OF INFORMATION**

In accordance with the DPA 2018 and GDPR, each school is a data controller in respect of the personal data it processes and is therefore responsible for its compliance with this legislation whilst sharing information within the School and with Others.

Undoubtedly, schools will face situations whilst carrying out their safeguarding role, where they will decide that it is necessary, and in the best interests of a child or young person, to share child protection information relating to pupil(s). It may be necessary for the information to be shared with both specific colleagues within a school, such as the DT/DDT and Principal and with relevant agencies outside a school, such as the EA's Child Protection Support Service (CPSS), Social Services, a Guardian ad litem or the PSNI.

While it is preferable to do so with the consent of a pupil, the circumstances pertaining on a case by case basis, may not always make this possible or appropriate. When a school cannot be reasonably expected to gain consent from an individual, or if to do so could place a child at risk, the DPA 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows schools to share information without consent.

Regulation 5 of the Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022 explicitly sets out the information that may be shared between the Police and a designated person, and between a designated person and a class teacher. The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022 can be found [here](#).

Where an incident of domestic abuse concerning a child has or may have occurred, paragraph 9 of Regulation 5 sets out the information that may be shared between a designated person and a class teacher. Paragraph 9 of Regulation 5 covers both information disclosed by the child or by a relevant person (i.e. the Police) and is set out below for ease of reference:

*(9) The information mentioned in paragraph (7) is—*

- (a) *the information disclosed by the child to the class teacher or designated person;*
- (b) *any information received by the designated person from a relevant person under Regulation 3(1)(b), which the designated person reasonably believes needs to be shared with the class teacher to enable the class teacher to:*
  - (i) *effectively take account of the needs of the child, and any impact that the incident may have had on them, and*
  - (ii) *provide support to that child, where appropriate; and*
- (c) *any other information which the class teacher or designated person reasonably believes is necessary to enable each of them to:*
  - (i) *effectively take account of the needs of the child, and any impact that the incident may have had on them, and*
  - (ii) *provide support to that child, where appropriate.*

Child Protection information is confidential and often highly sensitive and decisions to share, or not to share, must always be made in the interest of protecting the child if at risk of significant harm. All staff should understand the importance of maintaining confidentiality and the consequences of any breach.

Relevant personal information, including Special Category personal data (sensitive and personal) can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional wellbeing.

ICO guidance advises that in an urgent or emergency situation personal data that is necessary and proportionate can be shared with relevant school staff and outside agencies as appropriate. This will depend on both individual circumstances in each case, the agreed protocols and procedures in place and any statutory duty to do so, both within schools and with relevant outside agencies.

However, information sharing is essential for effective safeguarding and promoting the welfare of children and young people and the extent of the sharing will be a judgement for schools to make. Any undue delays to share relevant information must be avoided in the interests of the individual.

Where it is decided to share personal data within and/or with outside agencies, it must be done so for the purpose for which you are sharing it, in line with data protection principles: necessary; proportionate; relevant; adequate; accurate; timely and secure.

In the interests of accountability and transparency, schools should keep a record of the decision(s) taken and the reasons for it – whether to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## USEFUL INFORMATION

There are a number of resources and services available to schools in relation to Child Protection & Record Keeping and more specifically in relation to Operation Encompass. Some contact information and links to resources, services and guidance which may be useful to schools in the processing of information relating to Operation Encompass are set out below:

<b>EA’s Child Protection Services</b>	<b>Email:</b> <a href="mailto:cpssantrim@eani.org.uk">cpssantrim@eani.org.uk</a> <a href="mailto:cpssarmagh@eani.org.uk">cpssarmagh@eani.org.uk</a> <a href="mailto:cpssbelfast@eani.org.uk">cpssbelfast@eani.org.uk</a> <a href="mailto:cpssdundonalddeani.org.uk">cpssdundonalddeani.org.uk</a> <a href="mailto:cpssomagh@eani.org.uk">cpssomagh@eani.org.uk</a>  <b>Telephone: 02895 985590</b>
<b>EA’s Information Governance Service</b>	<b>Email:</b> <a href="mailto:dpo@eani.org.uk">dpo@eani.org.uk</a> <b>Telephone:</b> 028 8241 1300 <b>Website:</b> <a href="#">EA Think Data Online Resource Hub</a>
<b>Operation Encompass</b>	<a href="#">EA Operation Encompass Guidance</a>  <a href="#">PSNI Operation Encompass Web Page</a>  <a href="#">Operation Encompass Website</a>
<b>DE Circular 2020/07 - Child Protection: Record Keeping in Schools</b>	<a href="#">Circular 2020/07 - Child Protection: Record Keeping in Schools</a>
<b>The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022</b>	<a href="#">The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022</a>

<b>OPERATION ENCOMPASS</b>
<b>DATA PROTECTION IMPACT ASSESSMENT</b>
<b>NAME OF SCHOOL – Dalriada School Ballymoney</b>
<b>INTRODUCTION</b>
<p>Operation Encompass is an early intervention partnership between the PSNI, Education Authority and Schools in Northern Ireland, aimed at supporting children who are victims of domestic violence in accordance with <i>The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022</i>. When the PSNI attend an incident of alleged domestic violence and school aged children are present, they will contact the school before the start of the next working day. Relevant information is then shared with a member of the school safeguarding team. This may include limited details of the incident pertaining to children’s involvement/exposure and the names of alleged perpetrators/other victims. The purpose of this information sharing is so that school staff can meet the immediate emotional needs of children who have been victims of domestic violence.</p>
<b>NATURE OF PROCESSING</b>
<p>Previously the PSNI did not routinely share information about domestic violence cases directly with schools. Schools were often in receipt of this type of information in accordance with the sharing of safeguarding information by social services as part of their assessment process. This is in line with established safeguarding policy and procedure. Social services are always informed when a child is present during an incident of domestic violence. As a result of the introduction of <i>The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022</i> information relating to domestic violence/abuse incidents where a child is present will now be routinely shared with schools in Northern Ireland.</p> <p>In response to a domestic violence/abuse incident where a child is present the PSNI will collect information relating to the school the child attends. They will then make contact with the school, confirm the child is in attendance and share details of the incident with the school. Dependent on the incident, both personal and special category information will be shared. Given the nature of the incidents it is anticipated that the information being shared with the school will often include special category information.</p> <p>The Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022 explicitly states the information that may be shared with Schools by PSNI:</p> <p><i>(2) For the purposes of paragraph (1) “information” means—</i>  <i>(a) the date, location and approximate time of the incident;</i></p>

- (b) the nature of the incident;*
- (c) the severity of the incident, where relevant;*
- (d) the name and date of birth of the child that the incident concerned and their usual address, where different from the location of the incident;*
- (e) who the incident involved and their relationship, if any, to the child;*
- (f) information about whether or not the child was present, or in the immediate vicinity of where the incident occurred, and if in the home, where the child was in the home;*
- (g) information about where a child was neither present or in the vicinity of the incident but by reason of being present at the scene shortly afterwards (for example) perceived the aftermath; and*
- (h) such other information relating to the incident as the relevant person reasonably believes is necessary for the purposes mentioned in paragraph (1)(b).*

Where a parent refuses to tell the Police what school their child attends, then the PSNI will contact the EA's Child Protection Support Service with the child's name and DOB so they can tell the Police which school to share the Operation Encompass information with. This is covered in the statutory regulations.

When this information is shared with the school, the teacher will prioritise supporting the child. Following this, they will make a record of the information and their actions within the Child Protection file as per DE Circular 2020/07 – 'Child Protection: Record Keeping in Schools'. This file cannot be accessed by staff who are not in the Safeguarding Team. On occasion relevant information will be shared with other staff in the school if this is in the best interests of the welfare of the child. All school staff are aware of the need for confidentiality and are trained in this. On other occasions schools may contact the EAs Child Protection Support Service to discuss a case and this is in-line with DE Circular 2017/04 - 'Child Protection in Schools'.

The school staff will record details of the alleged incident within the school child protection file. This may include details of the alleged incident and personal details such as names of individuals involved.

In good child protection practice, professionals synthesise and assess information as a whole. Numerous case management reviews have taught us that often it can be lots of smaller pieces of information that can add up to describe a picture of a child at risk. Therefore, new information shared by Operation Encompass may well add to existing information held in the child protection file and help inform a wider assessment of risk and need for a child. Teachers will then act on this on the basis of existing policy and procedure (DE Circular 2017/04 – 'Child Protection in Schools', SBNI Regional Policy and Procedure, Children Order 1995). The information will be retained as per the School Retention and Disposal policy for Child Protection files as set out in DE Circular 2020/07 – 'Child Protection: Record Keeping in Schools' (DOB + 30years) found [here](#)

## **SCOPE OF THE PROCESSING**

The data will include names of alleged perpetrators and victims, the names of the children exposed to the incident of domestic violence and some details about what is alleged to have happened. Whilst the information being processed will not always be special category data it is recognised that any information received as part of Operation Encompass is of a sensitive nature. The school will therefore process this information securely in line with current procedures for child protection information, which are already in place.

The information is likely to be about an alleged criminal offence. Given that the Operation Encompass calls are made as soon as is practical after the Police call out, these alleged offences are always going to be at the very early stages of a formal investigation. School staff will have a good understanding of this via the Operation Encompass training that they will have completed.

No financial information will be shared within an Operation Encompass call. However, information might be shared about alleged financial abuse/financial control as it pertains to the domestic abuse situation.

Every time there is an Operation Encompass call, the school will make a record of the information provided by the Police in the child's child protection file as per DE Circular 2020/07 – 'Child Protection: Record Keeping in Schools'. This information will be kept as per the school's retention and disposal policy (DOB + 30 years).

The individuals who are affected by this data storage, are anyone connected with the incident of alleged domestic violence, whose details are shared by the PSNI.

Each school will only be responsible for files linked to their own pupils. Should a school close down, the CP information will be treated as per the DE Circular 2020/07 – 'Child Protection: Record Keeping in Schools'. Where CPSS are aware of an Operation Encompass call, a record will be made as per the EA Records Management policy.

All information processed by the school pursuant to Operation Encompass and the Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022 will be processed on the lawful basis that such processing is necessary for the School to perform its public task (i.e. to enable the school to perform its statutory functions and tasks as a public authority in relation to the Operation Encompass and the Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022, and to safeguard and promote the welfare of pupils. If the information provided includes special category data, the School will process such data on the basis that there is a

substantial public interest in doing so in the performance of its statutory functions. Any health data or criminal information provided by the PSNI pursuant to the Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022 will be for the purposes of ensuring school staff can meet the immediate emotional needs of children who have been victims of domestic violence, to safeguard and promote the welfare of those children

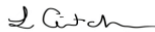
**IDENTIFY AND ASSESS RISKS**

<b>Describe source of risk</b>	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
1. There is a risk of unauthorised access to sensitive personal information processed in connection with Operation Encompass if the information processed is not stored securely	Possible	Significant	Medium
2. There is a risk of unauthorised / inappropriate sharing of sensitive personal information processed in connection with Operation Encompass.	Possible	Significant	Medium

<b>Identify measures to reduce or eliminate risks identified</b>				
<b>Risk</b>	<b>Measures to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved</b>
1.	<p>The school will follow the guidance set out in DE Circular 2020/07 – ‘Child Protection: Record Keeping in Schools’</p> <p>Information processed in connection with Operation Encompass will not be kept on the child’s Pupil/Educational Record. The school will have a separate secure confidential filing system for physical records of child protection concerns and/or a secure electronic or online/cloud based system with restricted access and appropriate password protections.</p> <p>The filing system, whether physical or electronic, will be accessible to only the DT (Designated Teacher), DDT (Deputy Designated Teacher) or Principal.</p> <p>Physical or electronic Child Protection Records will not be removed from the school premises, except when taken to a case planning meeting in respect of the child, on foot of a court order, when a child transfers to a new school and there are Child protection concerns or when there is a Case Management Review/Domestic Homicide Review. If information needs to be taken out of the school, it will be transported securely and a record will be kept of when it was removed, by whom, for what purpose, and when it was returned. Any computing devices or data storage (including laptops, tablets, USB drives etc.) used to transport electronic Child Protection Records in the circumstances referred to above will be encrypted and password protected.</p>	Reduced	Low	Yes

2.	<p>The School will adhere to the Domestic Abuse Information-sharing with Schools etc. Regulations (Northern Ireland) 2022, which explicitly sets out when / what information may be shared between the Police and a designated person, and between a designated person and a class teacher.</p> <p>The school will also follow the guidance set out in DE Circular 2020/07 – ‘Child Protection: Record Keeping in Schools’</p> <p>The school will only share information where, it is deemed to be in the best interests of a child to share child protection information relating to pupil(s), and any sharing of such information will be as is necessary; proportionate; relevant; adequate; accurate; timely and secure.</p> <p>In the interests of accountability and transparency, the school will keep a record of the decision(s) taken and the reasons for it – whether to share information or not. Where the school decides to share information, the school will keep a record of what it shared, with whom and for what purpose.</p> <p>All staff involved in the processing of sensitive personal information in connection with Operation Encompass understand the importance of maintaining confidentiality and the consequences of any breach.</p>	Reduced	Low	Yes
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**SIGN OFF**

<b>Signature – School Principal:</b>	
<b>Print Name:</b>	<b>Mrs. L. Aitcheson</b>
<b>Date:</b>	<b>2/9/24</b>

