



# CHILD PROTECTION and SAFEGUARDING POLICY

## Policy Review

This policy will be reviewed in full by the Governing Body on an annual basis.

The policy was last reviewed and agreed by the Governing Body in Spring term 2018.

It is due for review in Spring term 2019.

Signature: *Mrs Vaughan* Date: 7.02.18

Head Teacher

Signature: *Mrs Hussain* Date: 7.02.18

Chair of Governors

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### 1.POLICY INTRODUCTION

Here at Pool Hayes Primary we aim to:

## Our Ethos and Values

- We aim to teach the whole child and encourage pupils to develop self-esteem, self-confidence and independence, in order to achieve their full potential.
- We aim to provide a broad and balanced curriculum incorporating a variety of learning styles that will challenge, inspire and enable our children to develop a lifelong love of learning.
- We aim to provide a happy, inclusive environment, which supports learning and social development and in which all children are valued equally.
- We aim to foster an understanding of and respect for cultural, social and religious diversity both within British society and the wider world.
- We recognise the vital importance of education in partnership with parents, governors and the community.

## Our Mission

Staff and children going for gold!

## Our Vision

Staff, children and parents working together to inspire, challenge and learn.

*Our school follows the child protection procedures as defined by Walsall Safeguarding Children Board (WSCB [www.wlscb.org.uk](http://www.wlscb.org.uk) ) and multi agency threshold guidance. We work with partners to ensure the best outcomes for children and young people.*

*This policy applies to all staff, volunteers and visitors to our school as safeguarding is everyone's responsibility. Our belief is that "**it could happen here**" and **we have the interest of the children** as our priority.*

All staff (this includes volunteers) are aware of the safeguarding procedures in our school and these are explained to as part of staff induction.

This includes:

- Our school's child protection and safeguarding policy
- Our school's staff behaviour policy (or code of conduct)
- Details of the designated safeguarding leads and their role
- A copy of Part one of Keeping children safe in education September 2016 should be provided to staff at induction, plus Annex A of the guidance.
- Use of the NSPCC whistleblowing line to receive free advice and support about how child protection issues are being handled at school

## **2. SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN**

Safeguarding and promoting the welfare of children is defined as:

- Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- Children includes everyone under the age of 18.
- Pool Hayes Primary staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
- All Pool Hayes Primary staff have a responsibility to provide a safe environment in which children can learn.
- Each school should have a designated safeguarding lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- All school and college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.
- Any staff member who has a concern about a child's welfare should follow the referral processes set out in appendix 1. Staff may be required to support social workers and other agencies following any referral.
- The Teachers' Standards 2012 state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

(Keeping Children Safe in Education, DfE September 2016)

<b>Designated Safeguarding Lead (DSL)</b>	<b>Mr A Carter</b>
<b>Head teacher</b>	<b>Mrs K Vaughan</b>
<b>Chair of Governors</b>	<b>Mrs T Hussain</b>
<b>Safeguarding Governor</b>	<b>Mrs T Hussain</b>
<b>Deputy DSL</b>	<b>Mrs D Williams</b>
<b>Single Point of Contact (SPOC)</b>	<b>Mrs K Vaughan</b>
<b>Looked After Children Designated Teacher</b>	<b>N/A</b>
<b>Designated Lead for Online Safety</b>	<b>Mrs M Adams</b>

### **3. EXPECTATIONS**

In our school staff, volunteers and visitors will:-

- Be familiar with our Child Protection and Safeguarding policies
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc
- Be involved in the implementation of individual education programmes, child in need plans, child protection plans and early help assessments where necessary
- Be alert to signs and indicators of abuse

#### **4. ETHOS**

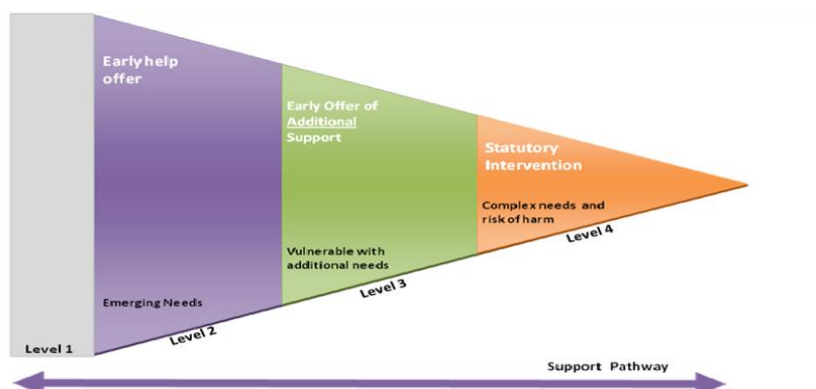
- We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the pupils; reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

#### **5. KEY PROCESSES INCLUDING EARLY HELP**

All staff and volunteers should be aware of the referral pathway in Walsall including single and multi agency Early Help offers as defined in Walsall Safeguarding Children Boards Threshold guidance ([www.wlscb.org.uk](http://www.wlscb.org.uk))

All staff and volunteers are required to inform the Designated Safeguarding Lead about any concerns about children using our schools procedures for sharing concerns. Many children are vulnerable in various ways and this is not always as a result of actions by parents/carers. Children can be deemed to be vulnerable in many ways; this may be through family separation, bereavement, behaviour issues etc.

The Walsall Pathway for levels of concern is defined below:-



All school and college staff should be prepared to identify children who may benefit from early help (levels 2 and 3) in addition to identifying risks of significant harm (level 4).

This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

When our staff members have any **concerns** about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the designated safeguarding lead to agree a course of action.

Where there is a safeguarding concern our school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

## **6. CHILDREN ACT 2004-EDUCATION AND SCHOOLS**

The Children Act 2004 places a statutory responsibility as follows:-

Education and schools:- All people working in education and schools contribute to the safeguarding and promoting of children's welfare. All schools and further education institutions have a statutory duty to safeguard and promote the welfare of children. Consequently, staff in these establishments play an important part in safeguarding children from abuse and neglect by early identification of children who may be vulnerable or at risk of harm and by educating children, about managing risks and improving their resilience through the curriculum. All schools and further education institutions should create and maintain a safe environment for children and young people, and should be able to manage situations where there are child welfare concerns.

## **7. LOCAL AND NATIONAL RESPONSIBILITIES**

Our school will fulfil their local and national responsibilities as laid out in the following documents:-

### **Keeping Children Safe in Education September 2016**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/526153/Keeping\\_children\\_safe\\_in\\_education\\_guidance\\_from\\_5\\_September\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526153/Keeping_children_safe_in_education_guidance_from_5_September_2016.pdf)

### **Eight page summary for staff (including Annex A)**

### **Working Together to Safeguard Children March 2015**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419595/Working\\_Together\\_to\\_Safeguard\\_Children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf)

### **Walsall Safeguarding Children Board procedures**

<http://wlscb.org.uk/concerned-about-a-child/cp-procedures-and-templates/>

### **The Education Act 2002 s157/s175**

<http://www.legislation.gov.uk/ukpga/2002/32/section/157>

<http://www.legislation.gov.uk/ukpga/2002/32/section/175>

### **What to do if you're Worried a Child is being Abused March 2015**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

### **Information sharing guidance for practitioners and managers 2015**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)

## **8. THE STATUTORY FRAMEWORK AND LEGISLATIVE DUTIES**

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Education Act 2002 (section 175/157)
- Local Safeguarding Children Board Child Protection Procedures
- The Education (Pupil Information) (England) Regulations 2005
- Dealing with Allegations of Abuse Against Teachers and Other Staff (DfE 2011)

## **9. ROLE OF THE DESIGNATED SAFEGUARDING LEAD**

The governing body have appointed Mr A Carter as the school's Designated Safeguarding lead as he is an appropriate **senior member** of staff, from the school's leadership team. Mr Carter has responsibilities as follows:-

Refer all cases of suspected abuse to the local authority children's social care or the Police in cases where a crime may have been committed.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC/head and DSL to will support staff who make referrals to the Channel programme.

Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required (this is a role for senior members of staff only with the relevant authority).

Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations/coordinating child protection activity

Liaise with the LADO/MASH in the local authority for child protection concerns when there are cases which concern a staff member (this is a role for senior members of staff only with the relevant authority in school and cannot be undertaken by staff in pastoral roles such as Parent Support Advisers, Learning Mentors etc). This means when a case is ongoing and should not be confused with the right to follow the schools or NSPCC's Whistleblowing procedures.

Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part-time staff.

Be alert to the specific needs of children in need, those with special educational needs and young carers.

Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.

Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.

Where children leave the school or college ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

**If the Designated Safeguarding Lead is not available you must refer your concerns to someone else who is named as a deputy for this role.**

## **10. THE RESPONSIBILITY OF THE GOVERNING BODY AND PROPRIETORS**

The Governing Body are the accountable body for ensuring the safety of the school

Our governing body will ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

This should include:

- an effective child protection policy;



- a staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - acceptable use of technologies, staff/pupil relationships and communications including the use of social media.

Our governing body will ensure that the school contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children 2015. Our school will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

Our governing body will ensure that our safeguarding arrangements take into account the procedures and practice of the local authority This includes the requirement under Section 175/Section 157 of the Education Act 2002 which placed a duty on:-

- The governing bodies of schools to have arrangements for safeguarding and promoting the welfare of children in place
- The Local Authority to monitor compliance of maintained schools

Our governing body recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and all staff have the opportunity to contribute to and shape safeguarding arrangements and the child protection policy.

Our governing body will ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Our governing body will ensure there are procedures in place to handle allegations against teachers, headteachers, principals, volunteers and other staff.

Our governing body will ensure that all staff members undergo safeguarding and child protection training at induction. The training will be regularly updated and the induction and training will be in line with advice from WSCB.

Our governing body reviews its policies/procedures annually.

The Nominated Governor for safeguarding in school is Mrs Tahra Hussain. They are responsible for liaising with the Head Teacher and Designated Safeguarding Lead over all matters regarding child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual pupils.

A member of the governing body (usually the Chair) is nominated to be responsible for liaising with the local authority and other partner agencies in the event of allegations of abuse being made against the Head Teacher.

## **11. THE ROLE OF DESIGNATED TEACHER FOR LOOKED AFTER CHILDREN**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Our Governing body will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

Our governing body has appointed a designated teacher to promote the educational achievement of children who are looked after and ensure that this person has appropriate training.

Our designated teacher for looked after children work with the virtual school head to discuss how best to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan

## **12. A SAFER SCHOOL CULTURE**

Our school pays full regard to 'Keeping Children Safe in Education' (September 2016) and our safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS).

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils. All staff/volunteers interviews will explore candidates commitment, understanding and knowledge of safeguarding children and young people.

Relevant staff have undertaken Safer Recruitment training. There will at least one person on every interview panel who has completed Safer Recruitment training.

## **13. WHISTLEBLOWING**

All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in our schools safeguarding regime and concerns will be taken seriously by the senior leadership team.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the schools senior leadership team.

Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **14. TRAINING**

All staff and volunteers will receive level 1 Safeguarding Children and Young People training at least every 2 years delivered by the Designated Safeguarding Lead in school. This will be completed on induction for new starters and within 2 years for continued review for all staff.

In addition all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings).

WSCB and Walsall Council offers training in Safeguarding Children and Young People, Child Protection, Safer Recruitment and other topics relating to safeguarding children. Staff training is not only crucial in protecting children and young people, but also makes them aware of how they can protect themselves against allegations. Further information about these courses can be accessed via the WSCB website at [www.wlscb.org.uk](http://www.wlscb.org.uk)

## **15. CURRICULUM**

Our governing body considers how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through PSHCE, SRE, SEAL, SMSC, British Values, e-safety, assemblies, approved visitors etc.

We will provide opportunities for pupils/students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. Relevant issues will be addressed through the PSHE curriculum, for example self-esteem, emotional literacy, assertiveness, power, sex and relationship education, e-safety and bullying. Issues will be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art.

All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole school approach. Our safeguarding policy cannot be separated from the general ethos of the school, which should ensure that pupils/students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

## **16. DEALING WITH CONCERNS AND DISCLOSURES – ROLES AND RESPONSIBILITIES**

All staff will be concerned about children and young people as below:-

- a child may disclose something that has upset or harmed them
- someone else might report something that a child has told them, or that they believe that a child has been or is being harmed
- a child might show signs of physical injury for which there appears to be no explanation
- a child's behaviour may suggest he or she is being abused

- the behaviour or attitude of one of the workers towards a child may cause concern
- a child demonstrates worrying behaviour towards other children.

We are aware that to consult with our designated safeguarding lead does not mean a referral has been made. This decision is the responsibility of the designated safeguarding lead for child protection who will contact the appropriate agency as and when required.

**If you are unhappy with the response you receive from your designated safeguarding all staff have the right to contact Walsall Childrens Services**

School will always discuss concerns with parents/carers unless to do so would:

- place the child at risk of significant harm or further risk of significant harm.
- place a vulnerable adult at risk of harm
- compromise and enquiries that need to be undertaken by children's social care or the police

Our school will endeavour to ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

***UNDER NO CIRCUMSTANCES SHOULD YOU LEAVE SCHOOL WITHOUT DISCUSSING YOUR CONCERNS WITH SOMEONE.***

Only a minority of children actively disclose abuse. Most child abuse is disclosed accidentally or through observation by an adult of a child's behaviour, words and physical appearance.

When a child does disclose abuse, this needs to be taken very seriously. It is important that any disclosure is dealt with appropriately, both for the wellbeing of the child and also to ensure that your actions do not jeopardise and legal action against the abuser.

**17. PROCEDURES FOR WHEN SOMEONE IS CONCERNED ABOUT A CHILD OR YOUNG PERSON**

- all concerns for children and young people should be recorded on standard pro formas available in school and via CPOMs
- all concerns should be recorded as soon as possible (and within one hour)
- all concerns should be referred to the designated safeguarding lead or deputy designated safeguarding lead in their absence
- all concerns of significant harm should be referred to the Local Authority Children's Services (MASH) without delay (see appendix 1)
- all concerns shared with the designated safeguarding lead should be considered alongside Walsall's Safeguarding Children's Board Multi Agency thresholds (Child Protection, Early Help offer)
- All concerns of allegations in relation to staff and volunteers harmful behaviour should be referred to the head (if the concern is in relation to the head the chair of governor should be informed without delay) See appendix 2

## **18. WHAT INFORMATION WILL YOU NEED WHEN MAKING A REFERRAL**

You will be asked to provide as much information as possible; such as the child's full name, date of birth, address, school, GP, languages spoken any disabilities the child may have, details of the parents, other siblings, chronology of previous concerns. Do not be concerned if you do not have all these details, you should still make the call.

## **19. RESPONSES FROM PARENTS**

Research and experience indicates that the following responses from parents may suggest a cause for concern across all categories of abuse:-

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;
- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation of minor injuries;
- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child from home; or
- Violence between adults in the household.

You should follow up the verbal referral in writing, within 24hrs. This should be done on a MARF (multi agency referral form). This can be downloaded from the WSCB website [www.wlscb.org.uk](http://www.wlscb.org.uk) under Child Protection Procedures.

**Call the Multi Agency Safeguarding Hub (MASH), Initial Response Team, Quest Building, 139-143 Lichfield St, Walsall.**

**Tel: 0300 555 2866 Monday–Thursday 8.45am–5.15pm, Friday 8.45am–4.45pm**

**Tel: 0300 555 2922 or 0300 555 2836 Emergency Response Team**

**Some of our pupils may not reside within Walsall Local Authority and we are aware that we should locate the number for the child's Local Authority's child protection referral team**

## 20. RESPONDING TO A CONCERN – THE “6 R’s RESPONSE”

Receive    Reassure    React    Record    Refer    Reflect

### RECEIVE

- If a child wants to talk to you, never ask them to come back later. Ask them what they want to talk to you about and, if you are concerned about their welfare, give them the time to speak to you.
- Never promise confidentiality, inform the child that you are happy to talk to them but if they tell you anything that you believe may be putting them at harm that you will have to talk to someone.
- Listen carefully to the child. Do not stop a child who is freely recalling information.
- Where a child is visibly upset or has an obvious injury, it is good practice to ask a child why they are upset or how an injury was caused, or respond to a child wanting to talk to you to help clarify vague concerns and result in the right action being taken.

### REASSURE

- Ensure that the child is aware that they have done the right thing in talking to you and that they have not done anything wrong.
- If you have any concerns that the child has been, or is at risk of harm, you must tell them that you will speak to someone to get help.

### REACT

- If you need to clarify information ask open-ended questions e.g. “*Is there anything you'd like to tell me?*”, “*Can you explain to me...*”, “*Can you describe to me...*”
- **Never** ask leading or suggestive questions e.g. ‘*Did he/she do anything that they shouldn't have done?*’
- **Never** ask ‘accusing’ questions e.g. “*Why didn't you tell someone earlier?*”
- **Never** criticise the alleged perpetrator, it may be someone that they will continue to live with.
- **Never** ask the pupil to repeat their disclosure for any other member of staff, it is your responsibility to share the information
- These four factors may compromise enquiries that need to be made later by children’s social care or Police.

### RECORD

- Make notes as soon as possible afterwards using the words that the child has used.
- Do not record your assumptions and interpretations, just what you heard and saw.
- Do not destroy original notes even if you later write things up more neatly and fully.
- Record the date, time and place of the disclosure.
- Sign any written records and identify your position in the school setting.

Do not ask a child to write and account or sign any of your documentation as this may compromise enquiries that need to be made later by

**REFER**

- Immediately inform the Designated Senior Person for child protection (insert details) or in their absence the Deputy Designated Senior Person for child protection (insert details) who will be responsible for following the appropriate procedures. In the absence of anyone being available in school, contact the Local Authority

**REFLECT**

Ask yourself if you have done everything you can within your role.

Refer any remaining concerns to the designated teacher, e.g. any knowledge of siblings in the school, or previous contact with parents.

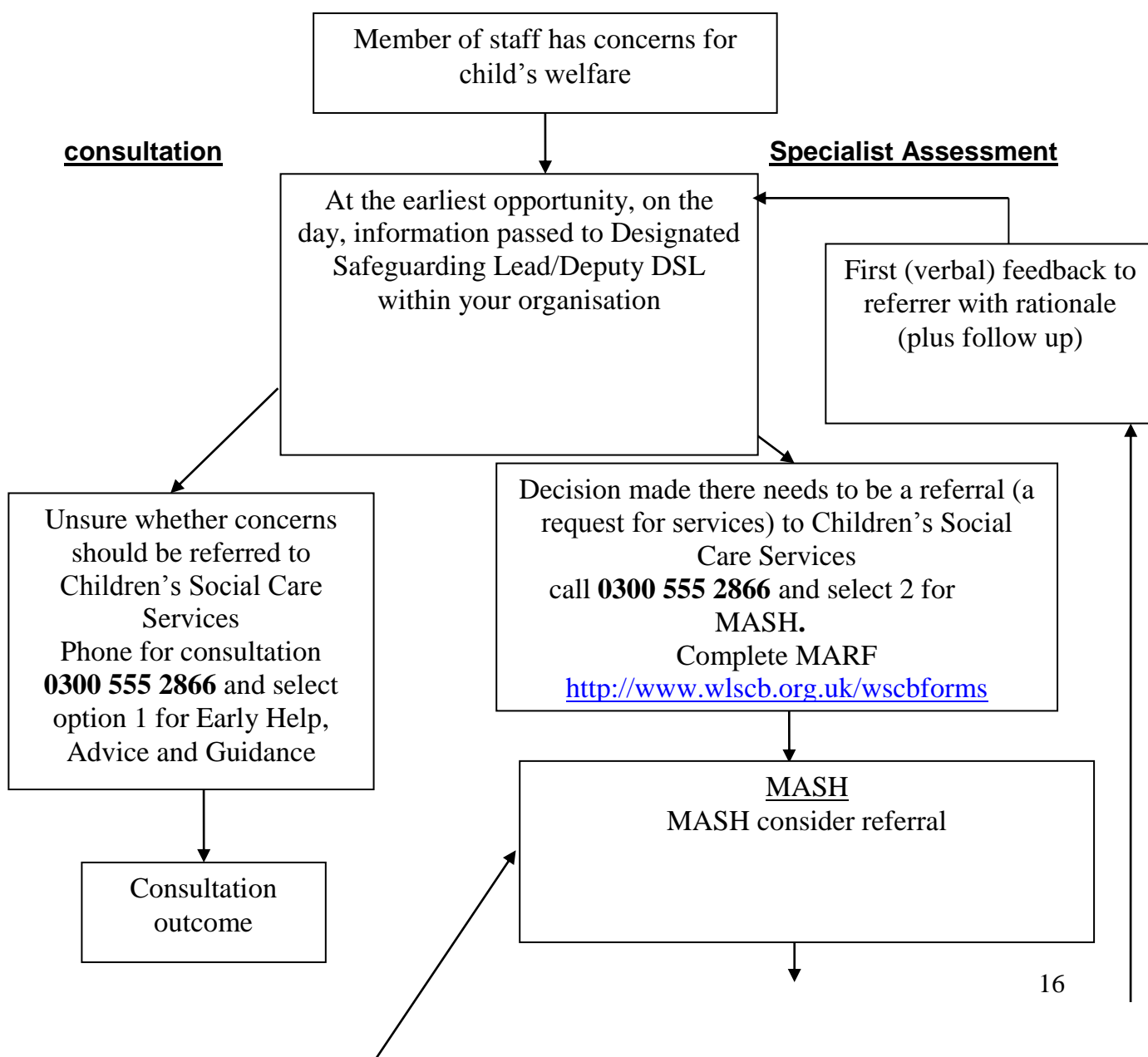
Dealing with disclosures can be difficult and disturbing; you should seek support for yourself via the support within your school or an alternative source but be aware of principles of confidentiality

This policy should be read and referenced alongside other school safeguarding policy and guidance:-

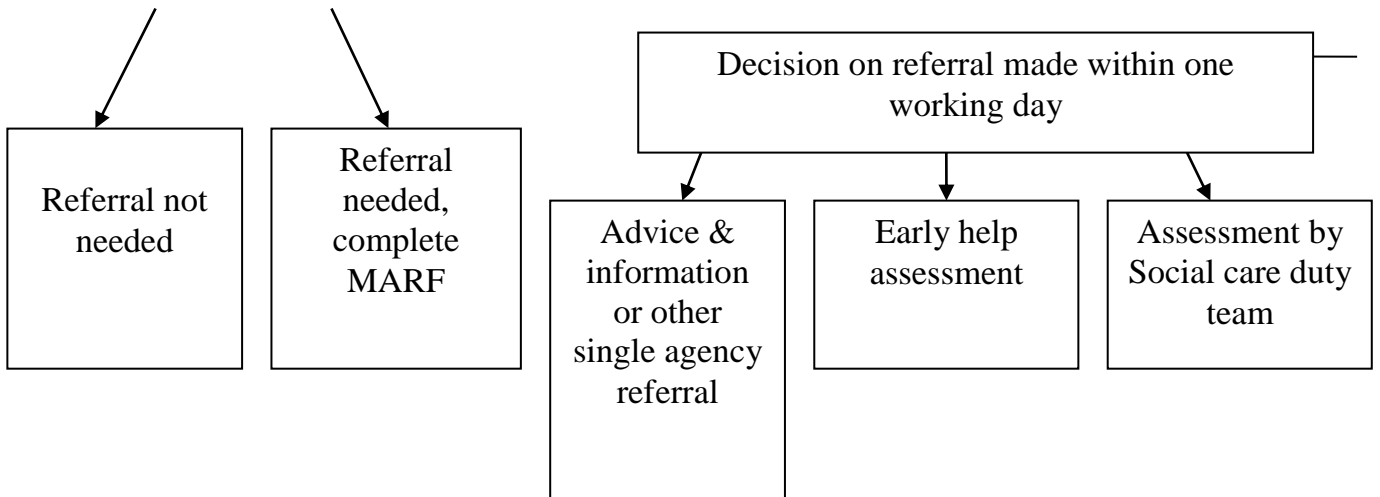
- Staff induction procedures
- Training and awareness raising courses matrix
- Monitoring and supervision procedures
- Recording and information sharing guidance  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)
- Recruitment and vetting policy
- Online safety policy
- Anti bullying policy
- Staff code of conduct/Staff Behaviour policy
- Photography policy
- Intimate care policy
- Safe handling/reasonable force policy and guidance
- Use of mobile phones policy
- Behaviour policy
- Whistleblowing policy
- Radicalisation and Extremism guidance for schools Sept 2015

**Appendix 1: Flow Chart**

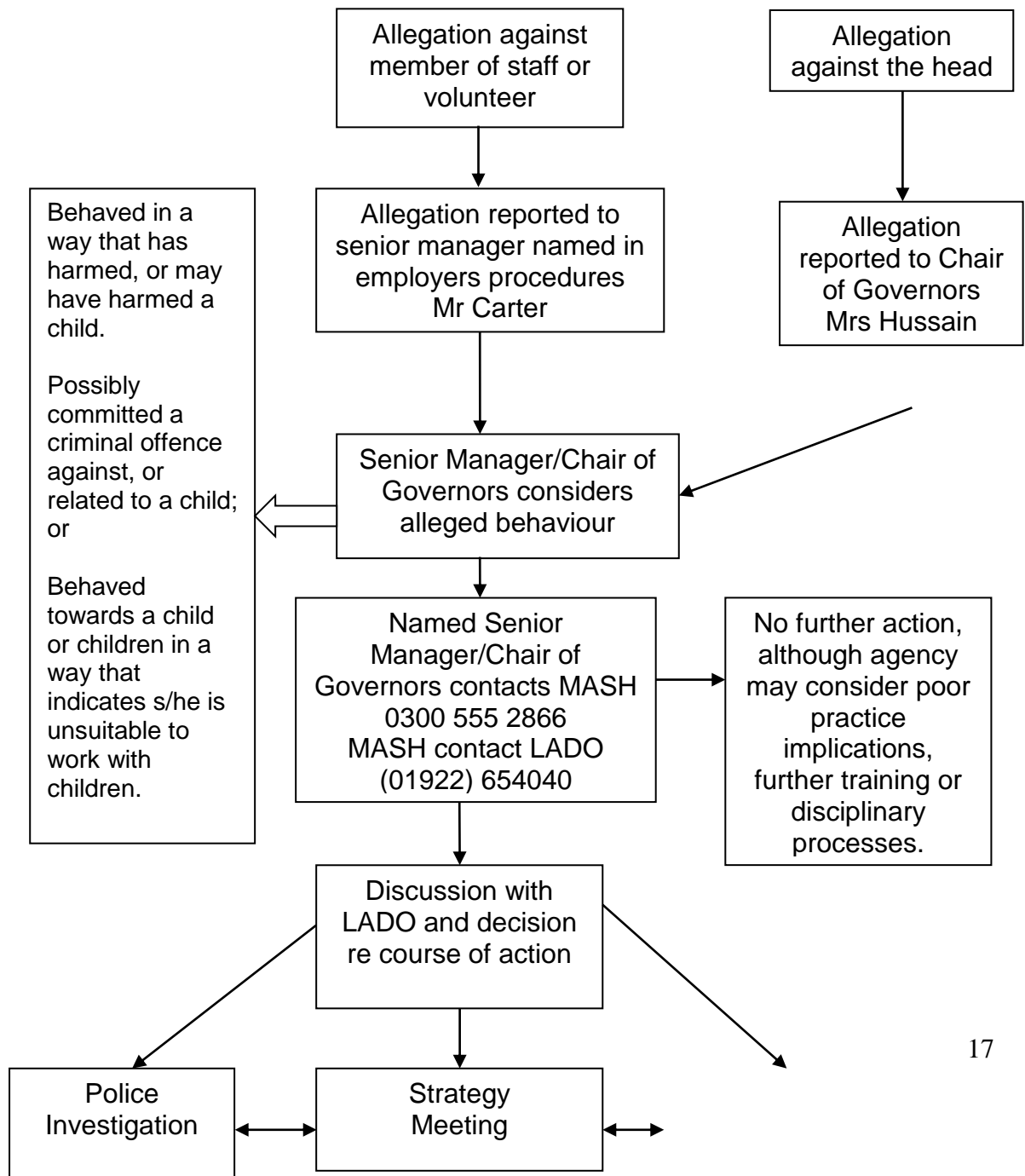
**Early Help Hub and Multi-Agency Safeguarding Hub (MASH) in Walsall**







**Appendix 2: Managing Allegations Against Staff and Volunteers**



Employer's Action (Including disciplinary action)
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### Allegations involving a member of staff / volunteer

This school is committed to having effective recruitment and human resources procedures, including checking all staff and volunteers to make sure they are safe to work with children and young people. Key staff involved in recruitment processes will undertake Safer Recruitment Training offered by the WSCB.

However, there may still be occasions when there is an allegation against a member of staff or volunteer. Allegations against those who work with children, whether in a paid or unpaid capacity, cover a wide range of circumstances

All allegations of abuse of children by those who work with children or care for them must be taken seriously. In these circumstances all allegations against other members of staff or volunteers should be referred to the Headteacher/principle. In their absence you should seek to speak with a member of staff from the Senior Leadership Team. If your concern is about the Headteacher/principle you need to speak to the Chair of Governors. Information sharing should not be barrier but in the unlikely event that you cannot access the people above please discuss your concerns with the Local Authority Designated Officer, Alan Hassall (01922) 654040 or 07432 422205.

The following procedure should be applied in all situations where it is alleged that a person who works with children has:

- Behaved in a way which has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way which indicates that he/she is unsuitable to work with children

The allegations may relate to the persons behaviour at work, at home or in another setting.

**\*\* All allegations should be notified to the Local Authority Designated Officer (LADO) within one working day.\*\* (call 01922 654040 or 07432 422205)**

A senior member of the Human Resources section for the agency must also be consulted.

The LADO will discuss the matter with the Named Headteacher/principle to determine what steps should be taken and where necessary obtain further details of the allegation and the circumstances in which it was made. The discussion should also consider whether there is evidence/information that establishes that the allegation is false or unfounded, whether a referral to the Children's Social Care Services is required and/or whether disciplinary action is appropriate.

Most allegations will require immediate referral to the Children's Social Care Services and the Police, but common sense and judgement must be applied in reaching a decision about what action to take.

If the allegation is not patently false and there is cause to suspect that a child is suffering or is likely to suffer Significant Harm, the LADO will immediately refer the matter to the Children's Social Care Services and ask for a Strategy Discussion/Meeting to be convened straight away.

Where the safety of other children is in question as a result of the allegation, consideration should be given to invoking the Complex (Organised or Multiple) Abuse Procedure (this can be found on the WSCB website [www.wlscb.org.uk](http://www.wlscb.org.uk)).

Some allegations may be less serious and at first sight might not seem to warrant consideration of a police investigation or enquiries by Children's Social Care Services. However, it is important to ensure that even apparently less serious allegations are followed up and examined objectively by someone independent of the organisation. Consequently the LADO should be informed of all allegations that come to the employer's attention and appear to come within the scope of this procedure so that he or she can consult Police and social care colleagues as appropriate.

Where a referral is made directly to Children's Social Care Services, they will consult with the Local Authority Designated Officer (LADO), the Police and the Named Senior Officer/Manager in the relevant agency or organisation.

Where such allegations are made, consideration must be given to the following three strands:

1. The police investigation of a possible criminal offence
2. Enquiries and assessment by Children's Social Care Services as to whether the child is need of protection or in need of services
3. Consideration by an employer of disciplinary action in respect of the individual

In addition, such allegations may give rise to complaints of poor practice, which should be considered in line with the agencies complaints or disciplinary procedures.

More information and the full Walsall Safeguarding Children Board Child Protection Procedures can be found at [www.wlscb.org.uk](http://www.wlscb.org.uk)

### **Appendix 3: Definitions of Abuse and Neglect**

**Abuse:** a form 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 others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

All staff are aware of safeguarding issues and aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

#### **Physical abuse**

A form of abuse which 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

## Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment 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, although it may occur alone.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communication suddenly (known as "traumatic mutism") can indicate maltreatment.

## Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

## **Neglect**

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

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

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;

- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers

## **FURTHER SPECIFIC RISKS**

### **PEER ON PEER ABUSE**

All staff are aware of safeguarding issues that can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. The latest (2017) guidance from the DfE gives advice to schools on how to prevent and respond to reports of sexual violence and harassment between children. <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Staff are clear as to the school policy and procedures with regards to peer on peer abuse as defined in the anti bullying, schools behaviour policy and broader child protection procedures.

Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

### **CHILD SEXUAL EXPLOITATION**

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to

recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The presence of any significant indicator for sexual exploitation should trigger a referral to children's social care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.

Please refer to Walsall Safeguarding Children Board procedures to consider completion of the screening tool and/or NWG risk assessment.

[www.wlscb.org.uk](http://www.wlscb.org.uk)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/279511/step\\_by\\_step\\_guide.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/279511/step_by_step_guide.pdf)

## **HONOUR BASED ABUSE/VIOLENCE**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead.

- Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Mandatory reporting commenced in October 2015; where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM



appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead and involve children’s social care as appropriate.

- **Forced Marriage**

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. In the UK it is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Honour based violence can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour/Izzat code. Staff have been briefed on the indicators of possible forced marriage and honour based violence and will refer any concerns to the Designated Safeguarding Lead immediately

## **EXTENDED SCHOOL AND OFF SITE ARRANGEMENTS**

Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site the school will undertake checks to ensure that they provide adequate safeguarding arrangements.

When pupils attend off-site activities, including day and residential visits and work related activities, the school will ensure that the proprietors of the activity/venue operate safe practices to maintain the safety of our children/young people and liaise with investigating agencies in the locality relevant to where the concern has taken place.

## **CHILDREN MISSING EDUCATION**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect.

School staff should follow the school’s procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Our school has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions.

Our school will inform the local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

All staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Our school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

## **CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff in our school recognise that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;

- Unwillingness to try to learn a child's means of communication;
- Ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

## PREVENTING RADICALISATION

The Counter-Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Schools and colleges should be aware of the signs and symptoms of a young person being at risk of becoming radicalised:-

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group/cause/ideology;
- communications with others that suggest identification with a group/cause/ideology.

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Pool Hayes Primary values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against

the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Pool Hayes Primary is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

Pool Hayes Primary seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Our school governors, the Head Teacher, Single Point of Contact and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of pupils by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

The broader responsibilities for our school are defined within the Walsall Radicalisation and Extremism guidance September 2015.

School and college staff should understand when it is appropriate to make a referral to the Channel programme; Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person.

## **PRIVATE FOSTERING ARRANGEMENTS**

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from

the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.

The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard his welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.

All staff in our school will inform the Designated Safeguarding Lead of any children that fall into the category of private fostering.

#### **Appendix 4: Glossary of terms**

Child – a young person under the age of 18 yrs

Child Protection Enquiry - A Child Protection Enquiry (usually referred to as a Section 47 Enquiry) is required if there are reasonable grounds to suspect that a child is suffering or is likely to suffer significant harm.

Early Help Assessment - Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Full Early Help guidance can be accessed via [www.mywalsall.org](http://www.mywalsall.org)

LADO – Local Authority Designated Officer - The Local Authority must appoint a Designated Officer (LADO) whose responsibility it is to be involved in the management and oversight of individual cases which fall within this procedure, providing advice and guidance to employers and voluntary organisations, liaising with the Police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistently, and with a thorough and fair process.

Designated Safeguarding Lead – each partner should have a Designated Safeguarding Lead (or, for health provider organisations, named professionals) for safeguarding. Their role is to support other professionals in their agencies to recognise the needs of children, including rescue from possible abuse or neglect. Designated safeguarding roles should always be explicitly defined in job descriptions. Professionals should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.

Significant Harm – The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Significant Harm is any Physical, Sexual, or Emotional Abuse, Neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life.

Harm is defined as the ill treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act  
Suspensions or allegations that a child is suffering or likely to suffer Significant Harm may result in a Core Assessment incorporating a Section 47 Enquiry.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

Walsall Safeguarding Children Board (WSCB) - Safeguarding and promoting the welfare of children requires effective coordination in every local area. For this reason, the Children Act 2004 requires each local authority to establish a Local Safeguarding Children Board. The WSCB must coordinate what is done by each person or body represented on the Board, for the purpose of safeguarding and promoting the welfare of children in the area of the authority, and ensure the effectiveness of what is done by each person or body for that purpose.

## **Appendix 5 - CHILDREN IN SPECIFIC CIRCUMSTANCES**

Guidance on children in specific circumstances are listed below and available via the DfE website:-

bullying including cyberbullying

children missing education – and Annex A

child missing from home or care

child sexual exploitation (CSE) – and Annex A

domestic violence

drugs

fabricated or induced illness

faith abuse

female genital mutilation (FGM)

forced marriage- and Annex A

gangs and youth violence

gender-based violence/violence against women and girls (VAWG)

hate

mental health

missing children and adults strategy

private fostering

preventing radicalisation – and Annex A

relationship abuse

sexting

trafficking